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ABSTRACT

Accepting the premise that nongovernmental accreditation is preferable to government accrediting, this study sought to identify changes which need to be made in the organization of nongovernmental accreditation in order that it can continue to be a socially useful enterprise. Through the use of the Delphi procedure, approximately 100 persons interacted to establish a list of functions that nongovernmental accreditation should serve or seek to serve and a statement of principles that should characterize its organization. The following recommendations and observations were reached as a result of this study: (1) Accrediting agencies should more clearly, specifically, and forthrightly state their purposes for accrediting; (2) Institutions and accrediting agencies should move deliberately, but swiftly, to establish a national body to coordinate, monitor, and supervise accreditation of postsecondary education; (3) Nongovernmental accreditation should engage in two practices to enhance its credibility: (a) make increasing use of independently appointed public representatives, and (b) utilize a public hearing approach to the development of major policies and standards, and (4) Accrediting agencies should increasingly involve related professions in the membership of both their policy-and decisionmaking bodies and visiting teams. (Author/PG)

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Organizational Structure of Nongovernmental Postsecondary Accreditation: Relationship to Uses of Accreditation

JERRY W. MILLER

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ORGANIZATIONAL STRUCTURE OF NONGOVERNMENTAL POSTSECONDARY ACCREDITATION: RELATIONSHIP TO USES OF ACCREDITATION

by

Jerry W. Miller

National Commission on Accrediting
Washington, D.C.

1973

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1973

(This publication is a slightly edited version of a dissertation submitted to the faculty of the School of Education of The Catholic University of America in partial fulfillment of the requirements for the degree of Doctor of Philosophy.)

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FOREWORD

The role of accreditation in American society has grown to the extent that virtually every institution and many programs of study find it desirable and necessary to seek accredited status. Institutions may exist but few thrive without accreditation.

As Dr. Jerry W. Miller indicates in this study of the purposes and structure of nongovernmental accreditation, a number of complex questions must be answered in the very near future. Among these questions are: (1) What functions should nongovernmental accreditation serve for society? (2) Given these functions and accreditation's dependence upon professional judgment and expertise, what principles should characterize its organization? (3) What changes need to be made in the current organizational structure of accreditation to make it congruent with these principles?

The National Commission on Accrediting perceives these questions to be of such concern to the postsecondary education community that it has concluded that Dr. Miller's study should be made available to a wide spectrum of those participating in the educational endeavors of our nation.

It is with a high degree of pride that this study is published. We feel that Dr. Miller has made a significant contribution to the understanding of the problem areas associated with accreditation.

It is also apparent that the suggested solutions to the variety of issues are worthy of the serious consideration of the institutions and the program areas subject to accreditation as well as the accrediting agencies involved in such activities.

This publication represents a slightly modified version of a dissertation completed by Dr. Miller at The Catholic University of America in 1973. We are grateful for permission having been granted by this institution to publish this study and we are appreciative of Dr. Miller's willingness to permit the National Commission on Accrediting to serve as the publisher.

Frank G. Dickey, Executive Director
National Commission on Accrediting

ACKNOWLEDGMENTS

A study of this type would not be possible without the assistance, interest, and understanding of numerous individuals and organizations. The author expresses deep appreciation to each individual and organization that contributed information, time, and other forms of assistance. Several should be singled out.

Special acknowledgment is due the Delphi participants, an extremely busy and sought-after group, who contributed valuable time and effort in completing the three phases of the project. The body of thought which they supplied on accreditation, its functions and organization, is the primary contribution of this study.

Special acknowledgment is also due my dissertation committee, The General Electric Foundation, and the National Commission on Accrediting. The committee--Dr. Frank B. Pesci, Chairman, Associate Professor of Education; Professor William A. Kaplin, Associate Professor of Law; and Dr. Leslie Ross, Assistant Director, Accreditation and Institutional Eligibility Staff, U.S. Office of Education--provided invaluable guidance and suggestions during the conduct of the study. The General

Electric Foundation made funds available to partially underwrite the costs of the study and the National Commission on Accrediting, its officers and staff, rendered important support and assistance. Miss Crystal Crone, NCA Office Manager, and Mrs. Alena Stevenson, formerly NCA Membership Secretary, assisted in numerous ways.

Very special thanks go to Dr. Frank G. Dickey, Executive Director of the National Commission on Accrediting, and Dr. William K. Selden. Dr. Dickey's advice, counsel, and encouragement are deeply appreciated. He and Dr. Selden, with whom this author was privileged to work on the study of Accreditation of Selected Health Educational Programs, deserve the lion's share of the credit for bringing a new social consciousness to nongovernmental accreditation. This author has benefited immeasureably by his association with them and their indulgence of long conversations on the concepts covered in this study.

My wife, June, and children, Karen and Brian, afforded unlimited encouragement, understanding, and moral support. It was deeply appreciated and helpful.

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CHAPTER I

INTRODUCTION

Accreditation conducted by private, nongovernmental agencies and associations is the single most important indication of quality in postsecondary education programs and institutions in the United States. Consequently, the activities and decisions of these agencies and associations are of great import to American society, affecting its members and institutions in many ways.

The judgments of accrediting associations and agencies are relied upon extensively by members of society in making personal educational decisions. Federal and state governments make substantial use of accreditation. The privilege of practice in many professions and occupations is tied to graduation from an accredited program or institution. Accrediting agencies exert strong influence on curricula, governance, and policies of educational institutions and their programs of study.

Thus, the activities and decisions of these private, nongovernmental bodies increasingly impinge upon the public interest. As a result, the role of accrediting agencies in

American society is being re-evaluated. The agencies are often accused of serving private and professional interests to the detriment of the social good. They are viewed by many as quasi-governmental agencies, exercising public functions for private gain. There is a growing chorus of critics asking for changes, either in the role of accrediting agencies or in their organizational structure.

Yet, the service provided by these agencies is valuable and must be performed for society. The alternative is complete reliance upon open competition among institutions and programs of study, restrained only by the concept of caveat emptor, a philosophy disdained by contemporary society. Abolishing accreditation would likely prompt a return to the chaos in education which gave rise to large scale accrediting activities earlier in this century.

The alternative to having accreditation performed by private nongovernmental groups is to make it a function of federal or state government. Federal control of educational standard-setting and evaluation historically has been resisted. Political tradition, if not current political thought, makes this possibility appear to be less than a desirable alternative. Furthermore, the extent of the federal government's constitutional authority to conduct accreditation is uncertain. The history of ineffectiveness among the states in regulating the academic portion of postsecondary education and the likelihood of great variances in policies, procedures, and quality of accrediting activities makes reliance on state government even less attractive.

Moreover, the art of accreditation, in its current state, lacks objective methods of measurement and evaluation. Consequently, accreditation cannot be conducted without heavy reliance upon professional expertise and subjective judgment. The greatest pool of these resources rests with the existing accrediting agencies and associations composed of professional educators and members of the professions. Therein lies the major dilemma of accreditation.

Society is dependent upon private groups to indicate quality in education. But these groups in turn are highly suspect and are questioned by society because of potential use of accreditation for private and professional gain. Accrediting agencies are asked to serve simultaneously the broad interests of society and the interests of institutional professional associations which support them. The interests of these associations may be consonant with societal interests and closely related to state and federal concerns, but on occasion they may be in conflict. In such cases, the critics of accreditation contend that societal interests become secondary considerations and private interests prevail.

It seems clear that the current organizational structure of nongovernmental accreditation is increasingly unacceptable. Criticism from private sources, from those associated with government, and even from those within the accreditation community is beginning to erode public confidence in the process. In time, it could seriously undermine the effectiveness of accreditation.

Questions to be Answered

The problem raises several basic questions. Satisfactory answers will determine how effective nongovernmental accreditation will be in serving the future needs of society. These questions include:

1. What functions should nongovernmental accreditation serve for society?

2. Given these functions and accreditation's dependence upon professional judgment and expertise, what principles should characterize its organization?

3. What changes need to be made in the current organizational structure of accreditation to make it congruent with these principles?

Purpose of Study

The purpose of this study was to seek answers to the above questions by:

1. Developing a list of functions which nongovernmental accreditation should serve for society.

2. Developing a statement of principles which should characterize the organization of nongovernmental accreditation in relation to the functions it serves in society, and

3. Identifying changes needed, if any, in the current organizational structure of postsecondary accreditation in the United States to bring it into conformity with the statement of principles.

Basic Assumptions of the Study

This study was conducted within the context of the following basic assumptions:

1. That educational institutions and society favor an approach to accreditation which is nongovernmentally controlled;

2. That nongovernmental accreditation is preferable because (a) it can be more responsive to the changing needs of society, (b) it can better serve to stimulate improvement in educational programs, and (c) it provides a diversity of control which is socially desirable;

3. That nongovernmental accreditation has served society well in the past, but current problems point to the need for change in organizational structure in order for accreditation to retain its social utility;

4. That actions of organizations tend to reflect the

interests represented in their decision-making structures; and

5. That actions of organizations tend to reflect more closely the interests of society when there is diversity of interests in the decision-making structure.

Scope of Study

All nongovernmental accrediting agencies which accredit postsecondary education and which meet either of the following criteria were included in this study:

1. listed as a recognized agency by the National Commission on Accrediting (1971 list); or
2. listed as a recognized agency by the U. S. Commissioner of Education (1971 list).

In addition, the operations and objectives of the National Commission on Accrediting, the Federation of Regional Accrediting Commissions of Higher Education, and the Accreditation and Institutional Eligibility Staff of the U. S. Office of Education were included insofar as the statement of principles of organization related to the functions of monitoring, regulating, coordinating, and recognizing accrediting agencies.

Operational Definitions

1. Accreditation--The process by which an agency or organization evaluates and recognizes an educational institution or program of study as meeting certain predetermined criteria or standards.

2. Nongovernmental accrediting agency--An accrediting agency which was not established and is not controlled by federal or state governments or any agency, department, or officer thereof.

3. Postsecondary education--Education offered by institutions primarily to individuals 18 years or older; admission may or may not require a high school diploma or equivalent credential.

4. Institutional accrediting agency--An accrediting agency which accredits the total institution.

5. Specialized accrediting agency--An accrediting agency which accredits a specialized school, college, program, or curriculum; in some cases, the school, college, program, or curriculum may be part of an institution offering a variety of curricula; in others, it may be an independent specialized institution.

6. Public interest--The community of societal interests held by the public in general, which may be congruent with but which tends to transcend the economic, personal, and professional interests of accrediting agencies and associations or of any other private group or individual in society.

7. Public sanction--Public acceptance and support, gained through the public disclosure of information, which tend to permit the private enforcement of policies and decisions which do not have the force of law.

8. Public representative--Any individual who serves on an accrediting body as a representative of the public interest and who does not simultaneously hold any paid or appointed position as an employee or officer of an educational institution, institutional or professional association, or agency of government which deals primarily with postsecondary education. A public representative could, however, include trustees or members of boards of control of postsecondary educational institutions.

9. Professional educator--Any person who is employed by an institution, organization, institutional or professional association, or agency of government which deals with postsecondary education and whose position involves primarily teaching, research, other academic functions, or administration at the postsecondary level.

Background and Historical Perspective

Introduction

Accreditation conducted by nongovernmental agencies has come to be the principal means of assuring the academic integrity and quality of postsecondary education in the United States. The U. S. Office of Education in one of its publications makes the following statement:

> One of the distinctive features of American Education is that the development and maintenance of educational standards are the responsibilities of nongovernmental, voluntary accrediting associations. The Office of Education is cognizant of the invaluable contribution which the voluntary accrediting associations have made to the development of educational quality in the Nation. It is the policy of the Office of Education generally to support and encourage the various recognized voluntary accrediting associations in their role as the primary agents in the development and maintenance of educational standards in the United States.[1]

There are two types of accreditation practiced by nongovernmental agencies in the United States: institutional and specialized. Institutional accreditation is concerned with the quality of the total institution. Specialized accreditation is concerned with the quality of a particular field of study such as architecture, dentistry, engineering, or medicine.

Many institutions hold accreditation by both institutional and specialized accrediting agencies. Because of the differing emphases of the two types of accreditation, accreditation of the institution as a whole by an institutional agency is not generally interpreted as being equivalent to specialized accreditation of each of the several parts or programs of the institution. Institutional accreditation does not validate a specialized program in the same manner, nor to the same extent, as does specialized accreditation.[2]

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[1] U. S. Department of Health, Education, and Welfare, Office of Education, Bureau of Higher Education, Nationally Recognized Accrediting Agencies and Associations, p. 1.

[2] *Ibid*., p. 2.

The National Commission on Accrediting (NCA) - a nongovernmental agency - and the U. S. Commissioner of Education, whose roles in accreditation will be discussed in a subsequent section, confer legitimacy upon accrediting agencies through their review and recognition procedures. It is important to note, however, that accrediting agencies can and do function without authorization from either the NCA or the Commissioner of Education.

Virtually every type of postsecondary educational institution and many programs of study are served by nongovernmental accrediting agencies. NCA recognizes agencies to accredit in 37 specialized fields and relies on the six regional associations of schools and colleges to grant institutional accreditation for universities, colleges, and junior and community colleges.[3] The U. S. Commissioner of Education lists 42 recognized accrediting agencies.[4]

The functions accreditation serves for American society could have been established as a constitutional or statutory responsibility of government, much as it is in other countries which have ministries of education. The fact that it was not is attributed by Selden to historical social values and political philosophy in the United States:

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[3] National Commission on Accrediting, List of Recognized Accrediting Agencies.

[4] U. S. Department of Health, Education, and Welfare, Office of Education, Bureau of Higher Education, Nationally Recognized Accrediting Agencies and Associations.

> The non-existence of an accrediting program operated by the national government can be attributed to the principles enunciated in the United States Constitution and to the American conviction that our social welfare is dependent upon education as a local responsibility. The absence of adequate state accreditation springs from a tradition of laissez-faire independence and sectarian rivalry, a fear of political interference, and a later acceptance of regional associations as the best instruments to perform what the states are legally empowered to do.[5]

The States

Beginning with the establishment of Harvard in 1636, the granting of charters for institutions of higher education has been a function of the colonies and later the states, except for a few royal and federal charters. Historically, the chartering process has not assured close scrutiny of educational standards and academic requirements of institutions, either at the time institutions are begun or on a continuing basis. The American Council on Education states:

> The states differ greatly in the qualifications required before a private group can obtain a charter to operate a college or university. In some states, such as New York, the authority is assigned to the state department of education and the board of regents; these agencies have set up standards that must be met before a new institution may be issued a charter. In many of the states, however, few standards if any are maintained, and any group that can afford the cost of incorporation, or can persuade the state legislature to issue a charter, can obtain the authority to grant all kinds of degrees regardless of the staff or facilities that it may have for such purposes. In very

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[5] William K. Selden, Accreditation: A Struggle Over Standards in Higher Education, p. 8.

> few states, furthermore, is there any supervision over privately controlled institutions after they have been established. Such laxity has permitted, from time to time, the operation of institutions which do little more than sell degrees or certificates.[6]

State laxity in chartering and control of institutions perhaps can be attributed to two factors. The majority of the early institutions were established and controlled by church groups. Their European heritage led them to be wary of any governmental influence or control of education.[7] Moreover, historically, academe and society at large have believed that all institutions, even publicly supported ones, can best serve society when political control is minimized. It is likely that no one has stated that position more eloquently or forcefully than Daniel Webster in arguing the inviolability of the Dartmouth College Charter before the Supreme Court of the United States:

> The case before the court is not of ordinary importance nor of every-day occurrence. It affects not this college only, but every college, and all the literary institutions of the country. They have flourished hitherto and have become in a high degree respectable and useful to the community. They have all a common principle of existence--the inviolability of their charters. It will be a dangerous, a most dangerous experiment, to hold these institutions subject to the rise and fall of popular parties, and the fluctuations of political opinions. If the franchise may be at any time taken away, or impaired, the property also may be

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[6] Otis A. Singletary, ed., American Universities and Colleges, p. 8.

[7] John F. Nevins, A Study of the Organization and Operation of Voluntary Accrediting Agencies, p. 10.

> taken away, or its use perverted. Benefactors will have no certainty of effecting the object of their bounty; and learned men will be deterred from devoting themselves to the service of such institutions, from the precarious title of their officers. Colleges and halls will be deserted by all better spirits, and become a theatre for the contention of politics. Party and faction will be cherished in the places consecrated to piety and learning.[8]

Such thinking still prevails. The Carnegie Commission on Higher Education in an April, 1971, report devoted considerable attention to institutional freedom from political control. The Commission listed eight examples as evidence that the states have recognized a greater degree of autonomy for public colleges and universities than that afforded other agencies of the state. The Carnegie Commission further called for public and private institutions to seek to establish guidelines clearly defining the limits of state concern and state regulation or control.[9] The concerns of the Carnegie Commission, though not directed to state accrediting activities, are closely related. The process of approval or disapproval of educational standards and practices is pregnant with possibilities of control.

To date, however, the collective efforts of the states in setting and enforcing educational standards have never been significant, even for publicly supported institutions. Even the New York State Board of Regents, the most effective of the state agencies and credited with starting the accreditation process in the United States,[10] is increasingly relying on nongovernmental accreditation. The Board of Regents has in most instances discontinued registration of out-of-state programs and institutions and is accepting instead accreditation granted by appropriate and recognized nongovernmental agencies. The Board has also altered significantly its procedures for in-state programs, relying more extensively on cooperative endeavors with nongovernmental agencies.[11]

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[8] Richard Hofstadter and Wilson Smith, eds., American Higher Education: A Documentary History, p. 211.

[9] The Carnegie Commission on Higher Education, The Capitol and The Campus: State Responsibility for Postsecondary Education, pp. 100-107.

Thus, chartering of institutions and their accreditation by state governments have not been significant forces in the establishment and maintenance of standards of educational quality in postsecondary educational institutions. Not only have the efforts been grossly uneven, but state activities in accreditation have achieved little status among the state governments or federal agencies. Among the state agencies, only the Board of Regents of New York State has been recognized by the U. S. Commissioner of Education for purposes of general accreditation of colleges and universities.[12] Many state government licensure bodies rely on accreditation status granted by nongovernmental agencies to establish eligibility to sit for examination as well as for other purposes.[13] Furthermore, chartering procedures in some states permit diploma mills to continue to flourish. NCA has adopted a policy statement opposing specialized accreditation by agencies of state governments.[14]

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[10] William K. Selden, Accreditation: A Struggle Over Standards in Higher Education, p. 30.

[11] Policy statement of The University of The State of New York, "Policy in Regard to Registration of Professional Curricula," pp. 3-5.

Federal Government

The federal government has "always operated on the periphery, never at the heart, of higher learning."[15] The tradition of federal nonintervention in curricula and administration of educational institutions is long-standing. Federal statutes reinforce this tradition with seemingly clear language:

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[12] U. S. Department of Health, Education, and Welfare, Office of Education, Bureau of Higher Education, Nationally Recognized Accrediting Agencies, and Associations, p. 5.

[13] Theresa Birch Wilkins, "Accreditation in the States," in Accreditation in Higher Education, ed. by Lloyd E. Blauch, U. S. Department of Health, Education, and Welfare, p. 41.

[14] Resolution Regarding Non-Recognition of State Agencies for Accreditation of Professional Programs.

[15] John S. Brubacher and Willis Rudy, Higher Education in Transition, p. 216.

> Nothing contained in this act shall be construed to authorize any department, agency, officer, or employee of the U. S. to exercise any direction, supervision, or control over the curriculum, program of instruction, administration or personnel of any educational institution or school system.[16]

This language subsequently was expanded and made applicable to previous legislation. Federal departments, agencies, officers, or employees were further prohibited from exercising any direction, supervision, or control over the "selection of library resources, textbooks, or other printed or published instructional materials" or "to require the assignment or transportation of students or teachers in order to overcome racial imbalance."[17]

Sentiment against federal government involvement in procedures which parallel present-day accreditation has been expressed in a number of ways in this century. President Taft used the power of his office in 1912 to prevent the publication of a classified list of colleges which had been prepared by Kendric C. Babcock, the first Bureau of Education specialist in higher education. A year later, President Wilson refused to rescind the order of his predecessor.[18] The Congress, rather than establish federal procedures, began to rely on nongovernmental accrediting agencies to establish eligibility for federal funds in 1952 when it passed the Veterans Readjustment Act. Since that time, this reliance has been repeated numerous times in federal legislation.

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[16] The 1958 National Defense Education Act, P. L. 85-864, 20 U. S. C. ss 402, and other acts have contained this language.

[17] 84 Stat. 169, 20 U. S. C. ss 1232a.

[18] Jennings B. Sanders, "Evolution of Accreditation," Accreditation in Higher Education, ed. by Lloyd E. Blauch, U. S. Department of Health, Education, and Welfare, pp. 17-18.

Recent sensitivity to federal involvement in accreditation is demonstrated by the content of a letter dated July 3, 1968, to The Honorable Harold Howe, II, then U. S. Commissioner of Education, who was at that time in the process of establishing the Accreditation and Institutional Eligibility Staff (AIES) in the Office of Education. The letter, signed by the 13 chief executive officers comprising the secretariat of the major higher education organizations in Washington, suggests that "accreditation" be eliminated from the title:

> We understand that "accreditation" refers primarily to the process of "recognizing" accrediting organizations, and under present circumstances there would seem to be no reason to believe that the Office of Education would use the breadth of the title to become engaged in actual accrediting activities. However, the presence of the word "accreditation" in the title for the staff unit might be misunderstood by both the academic community and those outside the educational institutions, and might conceivably present difficulties for the Office of Education in the future.[19]

Development of Nongovernmental Accrediting Agencies

Given the historical opposition to federal involvement

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[19] Letter to The Honorable Harold Howe, II, U. S. Commissioner of Education, July 3, 1968.

and the lack of a concerted and consistent effort among the states, it was natural that nongovernmental accreditation would develop to provide society with assurances about educational institutions and programs of study. It was also natural that the leadership for such a development would fall upon institutions and the professions. Problems which gave rise to accreditation were not then of broad concern to the public. Only a small segment of society was enrolled in higher education; thus, the problems tended to be viewed as institutional or professional in nature and not those of society in general.

The need for developing college admission requirements, common standards for college work, and consequently a definition of a college or university undergirded the whole fabric of collegiate and university accreditation.[20] Qualification for admission to graduate school also contributed to the inevitability of institutional accrediting.[21]

By the end of the nineteenth century, numerous organizations--23 types of organizations in 1896-1897--were interesting themselves in the problems, on a state, regional, and national basis.[22] These activities resulted in the birth of regional associations of secondary schools and colleges. The New England Association of Colleges and Secondary Schools, established in 1885, was the first of the regional associations, but it was the North Central Association of Colleges and Secondary Schools that issued the first list of regionally accredited colleges and universities in 1913. Interestingly, the first established regional association--New England--was the last to begin accreditation, waiting as late as 1952 to begin the process.[23]

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[20] Frederick Rudolph, The American College and University: A History, p. 438.

[21] George F. Zook and M. E. Haggerty, The Evaluation of Higher Institutions, Vol. 1, p. 33.

[22] John F. Nevins, A Study of the Organization and Operation of Voluntary Accrediting Agencies, p. 12.

Also around the turn of the century, other developments were taking place which greatly influenced the accreditation movement. The low state of medical education in general was being deplored. The American Medical Association was being reorganized with the creation of a Council on Medical Education. This resulted in 1905 in the first Congress on Medical Education and a published classification of medical schools based solely on the percentage of licensure examination failures for each school. Subsequently, the AMA began a rating system based on inspections of medical schools.[24]

This activity on the part of AMA, coupled with a concurrent study of medical education by Abraham Flexner which influenced the AMA to continue accreditation, "has probably exerted more influence on the course of specialized accreditation, as it has been developed in the United States, than has any other single program of accreditation. This influence extends beyond the health fields..."[25]

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[23] William K. Selden, Accreditation: A Struggle Over Standards in Higher Education, p. 37.

[24] William K. Selden, "Historical Introduction to Accreditation of Health Educational Programs," Part I: Staff Working Papers, Accreditation of Health Educational Programs, p. A-3.

The dramatic success of organized medicine in forcing the closing of inferior medical schools and in upgrading medical education established the precedent for other professions to become involved in establishing and maintaining educational standards for their future members.

The professions of dentistry (1918), law (1923), engineering (1936), and pharmacy (1940), following the example of medicine, were among the first groups to start accreditation programs.[26] Currently, the National Commission on Accrediting recognizes agencies and associations to accredit in 37 professional or occupational fields.[27]

Nongovernmental accreditation is also an outgrowth of the broad role the professions assume in American society:

> Lawyers not only give advice to clients and plead their cases for them; they also develop a philosophy of law--of its nature and functions, and of the proper way in which to administer justice. Physicians consider it their prerogative to define the nature of disease and of health, and to determine how medical services ought to

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[25] Ibid., p. A-1.

[26] John R. Mayor, Accreditation in Teacher Education: Its Influence on Higher Education, p. 20.

[27] National Commission on Accrediting, List of Recognized Accrediting Agencies.

> be distributed and paid for. Social workers are not content to develop a technique for case work; they concern themselves with social legislation. Every profession considers itself the proper body to set the terms in which some aspect of society, life or nature is to be thought of, and to define the general lines, or even the details, of public policy concerning it.[28]

Since higher education is, in the vast majority of cases, the only route to membership in a profession, it was natural that the professions would extend their social role to a concern for education. Professional groups justify their involvement in accreditation as a means of protecting the "potentially gullible client from incompetent and unscruplous 'experts'," and protecting the "qualified practitioner against unfair competition."[29]

Accreditation Expands

Although the initial focus was on professional schools and colleges and universities with a liberal arts base, the process of accreditation has since been instituted for other types of institutions on a national basis. Efforts at accrediting independent business schools and colleges were instituted as early as 1912 but it took until 1952 to merge a number of accrediting operations into the nationally recognized and accepted

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[28] Everett C. Hughes, The Professions in America, p. 3.

[29] Wilbert E. Moore in collaboration with Gerald W. Rosenblum, The Professions: Roles and Rules, p. 111.

Accrediting Commission for Business Schools.[30] ACBS accredits independent nonprofit and proprietary schools and colleges of business. Private home study and correspondence schools now have access to a recognized accrediting agency.[31] Private non-profit and proprietary trade and technical schools are also eligible for accreditation.[32] The regional associations have recently established procedures to accredit public vocational and technical schools and institutes. Accreditation is also available for such educational efforts as medical laboratory schools, bible colleges, schools of cosmetology, nurse anethesia, hospital programs in nursing, and clinical pastoral education programs.[33] The most rapidly expanding area of accreditation is in educational programs for the allied health occupations, approximately 80 per cent of which are located in hospitals and laboratories.[34]

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[30] Jay W. Miller in collaboration with William J. Hamilton, The Independent Business School in American Education, p. 153.

[31] Ossian MacKenzie, Edward L. Christensen, Paul H. Rigby, Correspondence Institutions in the United States, p. 208.

[32] A. Harvey Belitsky, Private Vocational Schools and Their Students, p. 56.

[33] U. S. Department of Health, Education, and Welfare, Office of Education, Bureau of Higher Education, Nationally Recognized Accrediting Agencies and Associations, p. 1.

[34] Jerry W. Miller, Part II: Staff Working Papers, Accreditation of Health Eductional Programs, p. H-4.

Summary

The institution of nongovernmental accreditation is decreasingly referred to as a voluntary endeavor. Its influence in education and society is so encompassing and pervasive, as will be seen in a later section on uses of accreditation, that accreditation is virtually mandatory for the successful operation of educational institutions and their programs of study.

The general public, and even many educators, understand little about how accreditation is organized and how it operates. Yet the term "accredited" applied to an institution or a program of study most often results in a sense of acceptance and trust in the minds of most members of society. For this reason and for the many other functions it serves, nongovernmental accreditation has become an American institution.

CHAPTER II

REVIEW OF LITERATURE

Introduction

The literature on accreditation is generally divided into two categories: (1) criteria, standards, and evaluation procedures, and (2) commentaries on the organization and the functions or uses which accreditation serves in American society. Because of the focus of this study, the review of literature will concentrate on the latter category.

Three factors have served to increase the volume of literature on the organization and uses of accreditation over the last decade and a half. First, accreditation has gained new visibility and importance due to its relationship to federal funding and the increased emphasis on education in general. Second, the trend toward specialization in education has continued, resulting in continued pressures for new programs of specialized accreditation and expansion of institutional accreditation to cover new types of institutions. Third, forces at work in society are prompting inquiry into the roles of many social institutions. Nongovernmental accreditation is no exception, as a survey of the literature reveals.

The body of thought on the role and organization of nongovernmental accreditation in society has emanated from a variety of sources. Leaders in accreditation, studies of accreditation, and government reports have all made significant contributions as have scholars who have studied the professions and the activities of professional associations. An authoritative and influential body of thought also is emerging from litigation involving accreditation and from other court cases involving judicial principles which are applicable to the activities of accrediting agencies. Some official correspondence and documents also have pertinence for this study. Interestingly, scholars studying higher education in general have devoted little time and effort to accreditation. Thus, the general literature of higher education has little to contribute to the body of thought for this study.

Social Value of Accreditation

The literature generally recognizes that accreditation is a socially important function. For example, the Preamble of the Bylaws of the National Commission on Accrediting acknowledges the useful services of accrediting bodies:

> ...accrediting agencies have often been instruments for the maintenance of high educational standards; they have protected society against inadequately prepared professional and technical practitioners; they have aided licensing authorities and facilitated the transfer of

> students; they have been helpful to students and parents seeking to identify sound institutions; they have aided institutions in withstanding improper political and other noneducational pressures; and they have stimulated broad consideration of educational problems and issues of more than local concern.[1]

Although the next paragraph goes on to outline abuses associated with accreditation, the final sentences conclude that the contributions of accrediting agencies to education should be preserved.

Others have taken a different view. Wriston, a former president of the North Central Association of Colleges and Secondary Schools, writing on the futility of accrediting said:

> The accreditation process inevitably is driven to judgments which are essentially superficial, transient in their validity, and a drain upon time, energy, and resources that ought to be put into the real obligations of the college or university.... Accreditation seeks not only to compare apples with grapes, but both with camels and cods.[2]

Capen, in his often cited address "Seven Devils In Exchange for One," urged a reduction in the number of accrediting agencies and attacked what he felt to be the irrelevancy of their standards. He personally longed for universities to be unencumbered by any standardizing body and vigorously attacked abuses in accrediting with colorful and inflammatory language. He did not, however, call for the abolition of accrediting as a few who quote him imply.[3]

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[1] National Commission on Accrediting, Bylaws, p. 2.

[2] Henry W. Wriston, "The Futility of Accrediting," Journal of Higher Education, p. 320.

Some educators, among them the founders of the National Commission on Accrediting, found little value in accreditation and hoped that it could be eliminated entirely. But

> ...others saw voluntary regional and professional accreditation as an expression of the American system of pluralistic governance; a potential, if imperfect, means of voluntary self-governance and self-control that colleges and universities must employ in the public interest unless they abdicate responsibility for their own regulation entirely to civil government.[4]

Dickey has written that accreditation is essential to protect society from mediocrity in the education process, students from being hoodwinked, and the professions from being downgraded by the entry of ill-prepared practitioners. Furthermore, he said, a profession has a social responsibility to assure society that its present and future membership will be adequately educated and prepared to assume those responsibilities which society expects of the profession.[5]

A study of institutional accreditation showed that more than 1,000 college presidents were almost unanimous in their opinions that institutional accreditation is desirable, is generally performed reasonably well, and should be continued.[6] This compares favorably with the results of "A Study of Attitudes Toward Accrediting Among Institutions of Higher Education" conducted in 1966 by the National Commission on Accrediting. Ninety-one per cent of the institutions in the sample favored the continuation of both institutional and specialized accreditation.[7]

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[3] For his discourse on accreditation, see Samuel P. Capen, The Management of Universities, pp. 256-271.

[4] National Commission on Accrediting, Facts About the Commission, p. 2.

[5] Frank G. Dickey, "The Social Value of Professional Accreditation," Journal of The American Medical Association, p. 597.

Messersmith and Medsker have stated that voluntary accreditation, despite its imperfections, is in its present form "an outstanding example of the willingness and ability of institutions and professions to police themselves and implement standards. Even critics of the process are aware that it has met an important social need."[8] Selden has suggested that the question is no longer should accreditation take place, but in what form, by whom, and who should finance the process.[9] An examination of the broadening role of accreditation appears to support his contention that accreditation is an essential social function.

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[6] Federation of Regional Accrediting Commissions of Higher Education, A Report on Institutional Accreditation in Higher Education, p. 2.

[7] National Commission on Accrediting (unpublished manuscript).

[8] Lloyd E. Messersmith and Leland Medsker, Accreditation of Vocational-Technical Curricula in Postsecondary Institutions, p. 67.

[9] William K. Selden, "Dilemmas of Accreditation of Health Educational Programs," Part II: Staff Working Papers, Accredittation of Health Educational Programs, p. G-2.

Role and Functions of Accreditation Expand

As has been noted, accreditation was begun in the United States for limited purposes. It was a means by which educational institutions could conduct a form of self-regulation in the absence of formal governmental restraints or directions. In addition, the professions were attracted to accreditation as a means of upgrading their memberships and closing inferior schools at a time when licensure was inadequately developed and unevenly enforced by the states.[10]

From those initial and limited objectives, the role of accreditation in society has been considerably expanded. The Accreditation and Institutional Eligibility Staff (AIES) of the U. S. Office of Education lists nine functions of accreditation. These are:

1. Certifying that an institution has met established standards;
2. Assisting prospective students in identifying acceptable institutions;
3. Assisting institutions in determining the acceptability of transfer credit;
4. Helping to identify institutions and programs for investment of public and private funds;

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[10] William K. Selden, "Dilemmas of Accreditation of Health Educational Programs," Part II: Staff Working Papers, Accreditation of Health Educational Programs, p. G-3.

5. Protecting an institution against harmful internal and external pressures;
6. Creating goals for self-improvement of weaker programs and stimulating a general raising of standards among educational institutions;
7. Involving the faculty and staff comprehensively in institutional evaluation and planning;
8. Establishing criteria for professional certification, licensure, and for upgrading courses offering such preparation; and
9. Providing one basis for determining eligibility for federal assistance.[11]

The AIES list not only illustrates the conception one government agency has of the functions of accreditation, but it also shows the broad current role the process now serves in society. Selden, in commenting on the AIES list, notes that accreditation by a nongovernmental agency is now so important to society and to institutions and their students that it is for all intents and purposes no longer a voluntary method but a process of compulsory voluntariness.[12]

Koerner agrees that accreditation's role in society is now so pervasive that membership in a regional association for a college or university is "not a live option for a college that wants to survive."[13]

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[11] U. S. Department of Health, Education, and Welfare, Office of Education, Bureau of Higher Education, Nationally Recognized Accrediting Agencies and Associations, p. 2.

[12] William K. Selden, "Dilemmas of Accreditation of Health Educational Programs," Part II: Staff Working Papers, Accreditation of Health Educational Programs, p. G-6.

> If anyone doubted the importance of accreditation, Parsons' (College) experience upon the loss of its accreditation ought to eliminate that doubt. Parsons immediately lost over half of its students... the decline continued... moving Parsons from a college of 5,000 students to one of 1,500 in the spring of 1969. Parsons students lost government benefits... (and) easy transfer of credit to other institutions and graduate schools. The quality of the student body declined... The ability of Parsons' recruiters to gain admittance to high schools also declined...[14]

As early as 1958, accreditation leaders in their public utterances began to recognize that accreditation was playing a major social role. Nyquist saw the new importance of accrediting as requiring the development of a national system of institutional accreditation. He suggested that new patterns of federal and state support would exert new pressures on accreditation.[15]

In 1966, an advisory committee studying the role and functions of the National Commission on Accrediting urged the "commitment to the protection of the public interest as the primary consideration in accreditation.[16]

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[13] James D. Koerner, "Who Benefits from Accreditation: Special Interests or the Public?" (Paper presented at Seminar on Accreditation and the Public Interest), p. 4.

[14] James D. Koerner, The Parsons College Bubble, p. 220.

[15] Chairman's Annual Report, Commission on Institutions of Higher Education, Middle States Association of Colleges and Secondary Schools.

In Selden's view, accreditation, as a significant element of governance of postsecondary education, is now a quasi-civil government function which, "if not so... performed, would need to be conducted directly by agencies of government."[17]

Proffitt has noted that federal use of the status granted by nongovernmental accrediting agencies has increased their importance in society. He points out that this requires accrediting agencies to assume the burdensome responsibility of public trust if the federal government is going to be justified in continuing its strong reliance upon them.[18]

Glenny has declared that accrediting agencies are part of a new leadership which is emerging in higher education, "anonymous in personality and awesome in power:"

> ...there are now over forty professional associations, consisting of practitioners in the field and professors in the universities who train the practitioners, which... assert rights to accredit programs within the institution. Universities have little or no control over such associations, which, dominated in numbers by the professionals in the field, seem to act as a self-interest group for the professional school or department.[19]

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[16] The Role and Function of the National Commission on Accrediting, p. 4.

[17] William K. Selden, "A New Translation of an Old Testament," Educational Record, p. 112.

[18] John R. Proffitt, "The U. S. Office of Education, Accreditation and the Public Interest" (Paper presented at Seminar on Accreditation and the Public Interest).

[19] Lyman A. Glenny, The Anonymous Leaders of Higher Education, p. 5.

The Report on Higher Education, better known as the Newman Report, agrees with Glenny that accrediting agencies operate from a strong base in higher education. The report states:

> In the name of protecting the standards of education, regional and specialized accrediting organizations pressure new institutions to develop faculties, buildings, and educational requirements on the pattern of established conventional colleges and universities. Moreover, these organizations-- dominated by the guilds of each discipline-- determine the eligibility of these new institutions for public support.[20]

The growing federal interest in accreditation became more evident in a 1971 report to Congress by the Secretary of the Department of Health, Education, and Welfare. The report directly set forth the federal interest and "responsibility" in accreditation:

> Only a few years ago, issues such as licensing, certification and accreditation were generally thought to be the concern of only the professional individuals and organizations that affected them. The public-policy aspects of these issues were not often perceived by decision-makers, long accustomed to the guild traditions that have characterized attitudes in this area. Today, these matters are not immune from public criticism; and the responsibility of both public and private leadership is to fuse health-manpower credentialing with the public interest.[21]

The report declares that accrediting agencies are functioning in a quasi-governmental role, and that their activities relate closely to the public interest because significant amounts of public funds are tied to the status they grant.[22]

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[20] A report prepared by an "independent task force," Frank Newman, Chairman, p. 66.

[21] U. S. Department of Health, Education, and Welfare, Report on Licensure and Related Health Personnel Credentialing, p. 1.

Kaplin and Hunter, studying the legal status of accrediting agencies, wrote in 1966 that these instrumentalities in the United States are "able, with minimal governmental interference, to set policies and standards in an area of vital concern to the public."[23] As shall be noted subsequently in this chapter, the broad social functions now performed by accrediting agencies are increasingly bringing them in contact with the courts.

Accreditation may be called upon to assume even more functions in the future. The financial squeeze in education and some disenchantment with the products of institutions and programs of study resulted in a pronounced call in the late sixties for accountability in education--how effective and efficient is education? Some have expected that accreditation would be called upon to carry a large measure of the accountability load. It was generally presumed that accreditation had been providing a measure of accountability for many years. Accrediting agencies have said a great deal about the quality of educational opportunity provided by institutions and programs of study and it has been generally assumed by educators and the public that quality educational opportunities most often result in quality educational products.[24]

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[22] Ibid., p. 14.

[23] William A. Kaplin and J. Philip Hunter, "The Legal Status of the Educational Accrediting Agency: Problems in Judicial Supervision and Governmental Regulation," Cornell Law Quarterly, p. 104.

Accreditation has not rated a great deal of attention in the call for accountability, however. Mortimer hints at one possible explanation. He points out that "evaluation is concerned primarily with educational effectiveness, whereas accountability is concerned with effectiveness and efficiency."[25] Effectiveness, Mortimer says, is the degree to which the organization succeeds in whatever it is trying to do; efficiency is an organization's capacity to achieve results with a given expenditure of resources. Accreditation, by and large, has not given a great deal of attention to efficiency.

Mortimer, in his review of the literature on accountability in higher education, makes only a fleeting reference to accreditation, viewing it as the means whereby professions hold institutions accountable for the quality of graduates of professional programs.[26] In projecting the dimensions and means of accountability in the next decade, he makes no direct reference to accreditation.

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[24] National Commission on Accrediting, "Working Paper for Board of Commissioners," p. 1.

[25] Kenneth P. Mortimer, Accountability in Higher Education, p. 6.

[26] *Ibid*., p. 12.

Romine, however, emphasizes that accreditation has a role in accountability, from the point of view of both effectiveness and efficiency. The emergence of the concept of accountability

> ...implies that the warranty of accreditation is subject to question. If accreditation as conducted by the regional associations is to retain its significance, it must be responsible to this accountability.[27]

He concludes that accreditation is obligated to do its part to restore trust between institutions of higher education and the public by providing accountability for education.[28]

Whatever the future demands on accreditation, its current role in society is comprehensive and substantial. This can be best documented by the many and varied uses made of the status granted by nongovernmental accrediting agencies.

Uses of Accreditation

No single list of all the uses made of nongovernmental accreditation is available. Indeed, the uses are so vast and varied that it would be virtually impossible to compile an all-inclusive and accurate listing. In addition to the broad functions listed in the previous section, specific uses will be cited to illustrate the impact of accreditation upon individuals and society. The listing will also serve to illustrate that accreditation simultaneously serves broad public purposes and

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[27] Stephen A. Romine, "Accreditation and the New Accountability in Higher Education," The North Central Association Quarterly, p. 257.

[28] *Ibid.*, p. 263.

and other narrower objectives of private agencies and associations.

Public Uses

Accreditation is a primary consideration of parents, prospective students, and counselors in choosing educational institutions and programs of study. Several national publications and directories attest to the importance of information on the accredited status of institutions.

Accredited Institutions of Higher Education lists colleges and universities accredited by or holding candidate or correspondent status with the six regional associations of colleges and schools as well as programs of study within the institutions which hold specialized accreditation by nongovernmental agencies.[29] Accredited Higher Institutions, which was published quadrennially by the U. S. Department of Health, Education, and Welfare, Office of Education, listed only accreditation status granted by nongovernmental accrediting agencies. U.S.O.E. has now replaced this publication with Accredited Postsecondary Institutions and Programs which it plans to publish annually. The new publication includes accredited status granted by nongovernmental agencies and institutions registered by the New York Board of Regents. American Universities and Colleges lists only accredited institutions or components of institutions accredited by regional or professional associations.[30] American Junior Colleges, beginning with the eighth edition, lists only institutions holding accredited or recognized candidate status with a regional association.[31] Guide to American Graduate Schools lists only accredited institutions.[32] The College Blue Book 1969/70 lists the accredited status of institutions and programs of study and has an 83-page section on accreditation.[33] Both the Guide and the Blue Book list only status granted by nongovernmental agencies. All these directories are widely used by counselors, prospective students, and their parents as well as by educational institutions to determine the status of other institutions and their programs of study.

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[29] Published annually by the American Council on Education.

Use of accreditation by state licensure authorities makes graduation from an accredited program highly important and often essential for individuals. State boards which license or admit to practice architects, dentists, engineers, lawyers, physicians, optometrists, pharmacists, podiatrists, and veterinarians, make extensive use of accredited status granted by nongovernmental accrediting agencies.[34]

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[30] Published quadrennially by the American Council on Education.

[31] Edmund J. Gleazer, ed., American Junior Colleges, p. ix.

[32] Herbert B. Livesey and Gene A. Robbins, Guide to American Graduate Schools, p. xxix.

[33] Max Russell, Editorial Director, The College Blue Book 1969/70, pp. 207-295.

Admission to graduate schools is most often dependent upon graduation from a regionally accredited college or university.[35] Nongovernmental accreditation is a primary factor in the transfer of credit from one institution to another.[36] State laws, other than those relating to licensure, occasionally make use of nongovernmental accreditation. For example, institutions eligible to participate in the Texas Hinson-Hazlewood College Student Loan Program must be "accredited by a nationally recognized accrediting agency or association listed by the National Commission on Accrediting."[37]

The Accreditation and Institutional Eligibility Staff of the U. S. Office of Education lists 21 federal government agencies which make use of nongovernmental accreditation.[38] Even this list may not be all-inclusive; it is at least growing. The Vocational Rehabilitation Administration (VRA), which provides extensive traineeship and fellowship support, recently notified institutions that only educational programs now accredited or in the process of being accredited in speech pathology or audiology will be eligible for traineeship grant support. The VRA has further stipulated that all programs receiving traineeship support must be accredited by April 1, 1974.[39]

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[34] Procedures of Accrediting Education in the Professions, a series of reports published periodically by the National Commission on Accrediting; Karen L. Grimm, "The Relationship of Accreditation to Voluntary Certification and State Licensure," Part II: Staff Working Papers, Accreditation of Health Educational Programs, Table V.

[35] See, for example, Graduate Studies, The Catholic University of America, p. 7.

[36] See Report of Credit Given by Educational Institutions, Albert L. Clary, ed., pp. 2-3.

[37] Rules and Regulations, Article II, Section I (6), Coordinating Board, Texas College and University System.

To institutions the most important use of accreditation made by the federal government, perhaps, relates to the fact that it is the primary means of establishing eligibility for federal funds. Five billion dollars in federal monies were expended on the basis of accredited status in fiscal year 1972.[40]

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[38] Accreditation and Institutional Eligibility Staff, U. S. Office of Education, Department of Health, Education, and Welfare, Bureau of Higher Education, "Governmental and Non-Governmental Agencies Utilizing Information About the Accredited Status of Institutions and Programs."

[39] American Speech and Hearing Association, American Boards of Examiners in Speech Pathology and Audiology Education and Training Board, "Report to the National Commission on Accrediting," p. 13.

[40] Interview, John R. Proffitt, Director, Accreditation and Institutional Eligibility Staff, U. S. Office of Education, March, 1971.

Accreditation status also is frequently a requirement to receive grants from private foundations.[41]

Other public uses of accreditation could be listed. Among them would be preference in employment opportunities both with government and in the private sector--a known fact. For example, commissioned appointments in the Public Health Service are dependent upon graduation from an accredited institution or program of study. To be eligible for a commission in the military services, a nurse must be a graduate of a program accredited by The National League for Nursing. Studies demonstrating the extent of such preferential treatment are not available, however.

Other Uses

Other uses of accreditation, although less public in nature, have a far-ranging impact on individuals. The American Chemical Society conducts accreditation primarily to assist "in identifying bachelor's degree graduates who qualify for member status in the Society with a minimum length of time."[42] Accreditation also determines the eligibility of graduates in forestry for certain grades of membership in the Society of

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[41] National Commission on Accrediting, Reports, p. 4.

[42] National Commission on Accrediting, "Accreditation in Chemistry," Procedures in Accrediting Education in the Professions, p. 1.

American Foresters.[43] Eligibility to sit for registry examinations for numerous health fields and/or to qualify for membership in professional societies is often tied to graduation from an accredited program.[44] Membership in associations of educational institutions also is often limited to those institutions holding accredited status.

It is this broad influence and impact of accreditation that has generated the controversy regarding its organization and role in society.

Organization of Accreditation

Introduction

Forty-five nongovernmental agencies or associations were included in the 1971 recognized lists of either the National Commission on Accrediting or the U. S. Office of Education for the purpose of accrediting institutions or specific programs of study. As will be seen in detail in Chapter V, these agencies operate under three types of arrangements: (1) sponsorship by an association of institutions, (2) sponsorship by a professional association, or (3) joint sponsorship by an association of institutions and one or more professional associations.

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[43] National Commission on Accrediting, "Accreditation in Forestry," Procedures in Accrediting Education in the Professions, p. 1.

[44] See Karen L. Grimm, "The Relationship of Accreditation to Voluntary Certification and State Licensure," Part II: Staff Working Papers, Accreditation of Health Educational Programs, Tables beginning with p. I-30.

Also, as will be seen in Chapter V, the membership of the accreditation policy- and decision-making bodies consists mainly of representatives of institutions and the professions. To date, public or lay representatives have not been included to any great extent on the membership of accrediting agencies. Moreover, there is no single supervisory agency with comprehensive authority to regulate, coordinate, or control all accrediting agencies to assure that they act in the public interest.

Concurrent with the growing recognition of accreditation's broad role in society has come increasing criticism of its narrowly-based organizational structure as the following review of the relevant literature on this topic will indicate. This questioning of the organizational structure of accrediting has come as part of a general re-evaluation of many of society's institutions and values. It is important to establish that context.

Impact of Social Change

A quotation from a recent annual report of the executive director of the National Commission on Accrediting establishes a focus for the current problems relating to the organization of accreditation:

> My reading and understanding of the forces at work in our society lead me to believe that colleges and universities and the professions should begin to share with other interests the responsibility for the accreditation process. The extent of this shared responsibility needs to be carefully studied and defined and an appropriate organizational structure formulated. At this point, is seems reasonable that a new organizational arrangement must recognize the new and increased uses of accreditation. It must provide for participation by such diverse interests as institutions, students, government, the professions, the public, and those who hold our institutions in trust.[45]

Selden, as noted earlier, delineated how accreditation was developed and fashioned as a result of well defined historical forces.[46] He more recently observed that "...we may confidently assume that its future course will likewise be shaped by forces that are exerting themselves on society today."[47]

Out of the civil rights movements of the 1950s and 1960s has come a broader examination of power, privilege, and discriminatory practices. As a result, social institutions are being asked to serve new functions, to abandon old ones, and to question former positions. This searching examination has ranged broadly across society, touching the family, corporations, government, churches, and education to the extent that nearly every social institution in America is being reexamined to determine whether it is meeting current social needs.

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[45] Frank G. Dickey, Shared Responsibility in Accreditation, Annual Report of the Executive Director, National Commission on Accrediting, p. 2.

[46] William K. Selden, Accreditation: A Struggle Over Standards in Higher Education.

[47] William K. Selden, "A New Translation of an Old Testament," Educational Record, p. 109.

Educational leaders such as Goheen have called the movement the "spirit of discontent" which seeks "expression and action."[48] This spirit is touching even the corporate giants of America. Dahl, Sterling Professor of Political Science at Yale University, has called for "interest-group" management of big business, involving in the governance of corporations representatives of the various interests which are affected by their activities.[49] Social action groups have made their presence felt in stockholders meetings. Such thinking and activity has caused Bank-America Corporation to declare:

> Any company, and certainly any bank, must include in its own balance sheet some recognition of the state of health of the community it serves. The corporation, by virtue of its own enlightened self-interest, the consciences of its officers and the expectations of the public, has a role to play in the process of solving contemporary ills.[50]

The spirit of discontent has likewise shaped new roles for churches.[51] Consumer takeover of major decision-making in the health fields is being seriously advocated and considered.[52] The American Assembly has stated that the health professions alone cannot sufficiently guard the consumer interest in health affairs.[53]

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[48] Robert F. Goheen, "Look to the Ideals and Face Up to the Obstacles," University: A Princeton Quarterly, p. 1.

[49] Robert A. Dahl, New York Times, p. 41.

[50] Bank-America Corporation, Annual Report, 1970, p. 4.

[51] Edward B. Fiske, New York Times, p. 14.

Social change as a way of life has likewise affected colleges and universities. Boulding has noted that "there is a feeling of the turn of the tide, a sense that a period is coming to an end and that the future may look increasingly different from the past."[54] Colleges and universities have been asked to become involved in the urban crisis, provide educational opportunity for all, and salvage all possible talent while providing individualized instruction and personal guidance.[55] With colleges and universities becoming deeply and variously involved in social problems, it was inevitable that the social temper would affect agencies and associations which impinge upon their administration, particularly accreditation.

Selden, who views accreditation as one of the important elements of the governance of higher education,[56] pointed this out in 1960[57] and has frequently spoken and written since about the social forces which will require change in accreditation.[58]

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[52] Victor Cohn, Washington Post, reporting on The Citizens Board of Inquiry into Health Services.

[53] The American Assembly, The Health of Americans, report of the 37th American Assembly, p. 9.

[54] Kenneth E. Boulding, Perspectives on Campus Tensions, David C. Nichols, ed., p. 4.

[55] See Issues of the Seventies, Fred F. Harcleroad, ed.

Reliance on Professional Expertise

Regardless of what the social temper may demand, there are practical limits to a democratic approach to determining quality in educational institutions and programs. The current state of the art of educational evaluation depends heavily upon professional expertise and judgment. Therein lies a dilemma:

> On the one hand, the maintenance of professionally established quality standards is generally accepted as a socially desirable function of professional organizations; this is particularly true of medical care, where the quality of services provided may mean the difference between life and death. On the other hand, the professional organization is inevitably concerned with protecting and advancing the economic interests of its members. Since it is inherently difficult to translate 'quality' into objectively quantifiable terms, there arises the possibility of an internal contradiction in the dual role of the professional organization as protector of society's welfare through the regulation of quality and as defender of the economic interests of the members of the organization.[59]

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[56] William K. Selden, Annual Report of the Executive Director, National Commission on Accrediting, pp. 21-29.

[57] William K. Selden, Accreditation: A Struggle Over Standards in Higher Education, pp. 91-92.

[58] For a bibliography of Selden's writings on accreditation through 1965, see Annual Report of the Executive Director, pp. 30-32.

[59] Elton Rayack, Professional Powers, p. xiv.

This conflict of interest described by Rayack applies foursquare to professionals who accredit educational institutions and programs and who, potentially at least, stand to gain by their decisions. Yet, society has come to rely on professionals to accredit and for very good reasons.

Barber points out that:

> ...generalized and systematic knowledge provides powerful control over nature and society...the requisite understanding (of such knowledge) is available in full measure only to those who have themselves been trained in and apply the knowledge. It follows that some kind of self-control, by means of internalized codes of ethics and voluntary in-groups, is necessary.[60]

This means of self-control has resulted in the formation of hundreds of "professional" associations or organizations in America, many of which seek to achieve what Becker has identified as some of the major symbols of a profession: (1) recruitment must be strictly controlled; (2) entrance must be strictly in the hands of the profession; (3) approval and accreditation must be done by members of the profession; and (4) since recruitment, training, and entrance into the practice are carefully controlled, any member of the professional group can be thought of as fully competent to supply the professional service.[61]

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[60] Bernard Barber, "The Sociology of Professions," The Professions in America, p. 19.

[61] Howard S. Becker, "The Nature of a Profession" in Education for the Professions, p. 33; Quoted by William K. Selden in "Dilemmas of Accreditation of Health Educational Programs," Part II: Staff Working Papers, Accreditation of Health Educational Programs, p. G-11.

Hughes states that professions tend to follow a set of themes in their "professionalizing" movements directed at changing their status in relation to clients, public and other occupations. The changes sought are

> ...more independence, more recognition, a higher place, a cleaner distinction between those in the profession and those outside, and a larger measure of autonomy in choosing colleagues and successors.[62]

As one means of asserting their autonomy, the professions have sought to carefully regulate entry into the profession through control of education. Such control is justified on the basis that the profession is the holder and the guardian of an esoteric, specialized body of knowledge; thus, only members of the profession are qualified to make judgments regarding educational programs which are preparing future members of the profession. Once a profession can substantiate such a claim, it can then use accreditation of educational programs as the principle basis for "choosing colleagues and successors."

The same argument given for accreditation of educational programs by the professions is used to support the conduct of institutional accreditation by professional educators. They, too, are the experts when it comes to the evaluation of the total institution.

Unquestionably, the activities of professional associations in setting and maintaining educational standards through accreditation have benefited society.[63] But such activities have not been "untainted nor unchallenged:"

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[62] Everett C. Hughes, "Professions," The Professions in America, p. 7.

> Self-regulation may serve to preserve and even enhance standards, but [it] may also be used merely to enhance occupational prestige, to control the number of authenticated practitioners in order to reduce competition and increase income, and not uncommonly, to protect a particular orthodoxy against reasonable and even superior alternatives.[64]

Moore tends to refute the idea that only the profession is in a position to determine the proper educational requirements for entry into the profession. He asserts that none of the older "established professions" has been able to command a complete monopoly on its claimed field of competence.[65]

Kaplin has pointed out that unquestioned reliance on professional expertise can be susceptible to abuse by professional groups. In some cases, he suggests that professional groups may not possess all the expertise needed to solve a particular problem or provide a particular service to society. He cites the solution of many health care problems as an example which may require the expertise of social and applied sciences as well as that supplied by the health professions.[66]

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[63] Eliot Friedson, Profession of Medicine, p. 30; Wilbert E. Moore, The Professions: Roles and Rules, p. 111.

[64] Wilbert E. Moore, The Professions: Roles and Rules p. 111.

[65] *Ibid*., p. 111.

Price has stated a principle which has an important bearing on the organization of accreditation:

> ...the more an institution or function is concerned with truth, the more it deserves freedom from political control. ...the more an institution or function is concerned with the exercise of power, the more it should be controlled by the processes of responsibility to the elected authorities and ultimately to the electorate.[67]

In accreditation, there is a need to find a middle ground between complete reliance upon private groups with the professional expertise and placing responsibility for the process on elected authorities who are responsible to the electorate. Numerous suggestions can be found in the literature which would preserve the nongovernmental character of accreditation and, presumably at the same time, make it more sensitive to societal interests.

Involvement of Lay or Public Representatives and Related Professions

As alluded to previously, many believe that society would be better served if the organizational structure of accreditation was diversified to include lay or public representatives and, in some cases, related professions. The reasons given or implied are two-fold: (1) accrediting agencies would be more fully aware of societal interests and needs, and (2) a diversification of membership on accrediting bodies would in reality increase their expertise to handle some problems.

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[66] William A. Kaplin, "The Law's View of Professional Power: Courts and the Health Professional Associations," Part II: Staff Working Papers, Accreditation of Health Educational Programs, p. J-10.

[67] Don K. Price, The Scientific Estate, p. 191.

Nyquist apparently was among the first to suggest that allied professions and occupations, as well as lay people, should become involved in improving accreditation.[68] Selden has long been an advocate of diversifying the organization of accreditation. He has called for inclusion of individuals from other fields of study, educational interests, and the general public in the membership of bodies conducting specialized accreditation. He has suggested that public members as well be included on regional accrediting agencies.[69]

Cartter, recognizing the changing role of accreditation in society, has urged consideration of the appropriateness of adding public members to the policy-making boards of accrediting.[70] Dickey has also urged that public members be added to the membership of accrediting agencies. He led the way to include trustees of institutions of higher education as

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[68] Ewald B. Nyquist, "The Meaning and Control of Professional Accreditation Analyzed," Social Work Education, p. 5.

[69] William K. Selden, "A New Translation of An Old Testament," Educational Record, p. 112.

[70] Allan M. Cartter, "Accreditation and the Federal Government," The Role and Function of the National Commission on Accrediting, p. 70.

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Accepting the premise that nongovernmental accreditation is preferable to government accrediting, this study sought to identify changes which need to be made in the organization of nongovernmental accreditation in order that it can continue to be a socially useful enterprise. Through the use of the Delphi procedure, approximately 100 persons interacted to establish a list of functions ~~which~~ that nongovernmental accreditation should serve or seek to serve and a statement of principles that should characterize its organization. The following recommendations and observations were reached as a result of this study: (1) Accrediting agencies should more clearly, specifically, and forthrightly state their purposes for accrediting. (2) Institutions and accrediting agencies should move deliberatelu, but swiftly, to establish a national body to coordinate, monitor, and supervise accreditation of postsecondary education. (3) Nongovernmental accreditation should engage in two practices to enhance its credibility: (a) make increasing use of independently appointed public representatives, and (b) utilize a public hearing approach to the development of major policies and standards. (4) Accrediting agencies should increasingly involve related professions in the membership of both their policy- and decisionmaking bodies and visiting teams. (Author/PG)

*Higher Education; *Accreditation (Institutions); *Organization; *Certification; *Standards

the "public members" of the Board of Commissioners of the National Commission on Accrediting.[71]

Proffitt has noted that in "our complex society of tomorrow it no doubt will be a verity that education will be too important to leave to the singular devices of the educators... and the professions, generally too important to leave to the professionals. The professions need to be ventilated...by the regular voice of the public interest."[72] He urged inclusion of public representatives on accrediting bodies, licensure boards, and the governing bodies of the professional associations.

The Newman Task Force, in stating its beliefs about the organization of accrediting agencies and the federal reliance upon them, said:

> We believe that (1) the composition of established accrediting organizations should be changed to include representatives of the public interest; and (2) Federal and State governments should reduce their reliance on these established organizations for determining eligibility for Federal support.[73]

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[71] Frank G. Dickey, Shared Responsibility in Accreditation, Annual Report of the Executive Director, National Commission on Accrediting, p. 2.

[72] John R. Proffitt, "Professions and the Public: A Crossroad of Interest," American Journal of Medical Technology, p. 3.

[73] Independent Task Force, Frank Newman, Chairman, Report on Higher Education, p. 66.

Studies and other commentators on the organization of accreditation have implied a great deal about the need for broader representation in the membership of accrediting agencies without explicitly spelling out the composition.

Koerner's scathing criticism of accreditation focuses on accreditation's narrow organization structure. He has directed most of his attention to the regional associations which he says "have become nothing but old-fashioned trade associations piously pretending to represent the public interest."[74] He makes it clear, however, that his criticisms of the regionals apply generally to all of accreditation. Koerner takes the position that colleges and universities associating to accredit one another constitutes a "fundamental conflict of interest."[75]

Koerner has not been alone in criticizing the organizational structure of accreditation. Seidman concluded:

> Accreditation systems are structured in such a way as to subordinate the welfare of the educational institution as an entity and of the general public to the interest of groups representing limited institutional or professional concerns. Nobody concerned with accreditation, including the National Commission on Accrediting, is wholly free of the taint of partisanship.[76]

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[74] James D. Koerner, "Who Benefits from Accreditation: Special Interests or the Public?" (Paper delivered at Seminar on Accreditation and the Public Interest.

[75] James D. Koerner, "Preserving the Status Quo: Academia's Hidden Cartel," Change, p. 52.

[76] Harold Seidman, "Accreditation of Postsecondary Education: Problems in Organization," Part I: Staff Working Papers, Accreditation of Selected Health Educational Programs, p. F-3.

Ward in 1970 found that persons "without a vested interest or persons or representatives of the public interest were not found in the power structure of any of the regional associations" and that "membership on boards of trustees of the associations and on higher commissions accrediting postsecondary occupational education was found to be overwhelmingly dominated by senior college and university presidents, vice presidents, and deans."[77] He also found few representatives of the public interest and "never a majority" on the policy-making boards of specialized accrediting agencies.[78]

Analyses by the Study of Accreditation of Selected Health Educational Programs show that only through the circuitous route of professional responsibility does the organization of accreditation in the health fields give more than token responsibility to its public trust function. What is done in the name of professional responsibility is not always accepted as being in accord with the public interest, even by members of the profession.[79]

The Newman Task Force has circulated widely a November 24, 1971, draft of "Accreditation and Institutional Eligibility."

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[77] Charles F. Ward, The State of Accreditation and Evaluation of Postsecondary Occupational Education in the United States, pp. 197-198.

[78] Ibid., p. 199.

[79] Jerry W. Miller, "Structure of Accreditation," Part I: Staff Working Papers, Accreditation of Health Educational Programs, p. B-30.

The recommendations in the draft called for the separation of institutional eligibility and accreditation and for new federal authority to deal with the restrictive practices of nonprofit groups. Particularly singled out were specialized accrediting agencies.[80]

A federal report, in discussing the roles of professional associations in accreditation, states:

> ...the organizations are, and must be, directly and actively concerned with the economic, political, and social welfare of their members--a fact which has a direct bearing on their organizational structure, operations and other related factors.[81]

It urges professional associations to study and justify their practices for the benefit of the consumer and the larger public interest.[82]

Implicit in many of the criticisms of the organizational structure of accreditation is the belief that change will not be generated by the accrediting agencies themselves, but must be forced by some organization which has authority over them. The literature reveals suggestions for a coordinating and supervising body for accrediting agencies which can bring about change.

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[80] Photocopy Draft furnished this author by Newman Task Force Staff Members, December, 1971. The reception afforded the draft probably will result in extensive revision.

[81] Maryland Y. Pennell, John R. Proffitt, and Thomas D. Hatch, Accreditation and Certification in Relation to Allied Manpower, p. 1.

[82] *Ibid.*, p. 13.

Coordinating and Supervising Accrediting Agencies

The need for coordinating--and to some extent, regulating--nongovernmental accrediting agencies gave rise in 1949 to the founding of the National Commission on Accrediting (NCA). For various reasons, however, NCA has never been a comprehensive supervisory body for all postsecondary accreditation. It has enjoyed a cooperative working relationship with the regional associations but it has never assumed authority over them. Neither has the NCA assumed responsibility for most postsecondary agencies accrediting programs or institutions which do not hold regional accreditation. No other agency, save the U. S. Office of Education, comes close to assuming nation wide responsibility for postsecondary education. The USOE role is directly related to eligibility for federal funding. Moreover, accrediting agencies must apply for recognition by the U. S. Commissioner of Education. Agencies can operate without either the NCA's or the Commissioner's approval.

This vacuum undoubtedly has fostered some of the problems in current-day accreditation. At least, the literature suggests that a strong national body with the responsibility of coordinating and supervising accrediting agencies could do much to alleviate many of the problems.

The NCA was urged in 1966 by an Advisory Committee studying its role to "assume a positive role of national leadership for the coordination and ultimate overseeing of all voluntary accreditation," including initially a closer relationship with the Federation of Regional Accrediting Commissions of Higher Education (FRACHE).[83]

Other proposals have been made to create a new national body to oversee accreditation. Elliott, for discussion purposes, proposed that Congress establish a National Board of Education to coordinate the various aspects of accreditation. Under Elliot's proposal, the Board might retain the existing agencies, which would function under its control, or phase them out.[84]

Others have proposed a creation of a quasi-governmental agency to oversee accreditation. These proposals have ranged from agencies with "statutory recognition" to a federally chartered "public corporation." A federal government report has, in fact, mandated the Commissioner of Education to undertake a formal review of accreditation with specific attention given to consideration of the possibility of "establishing a Congressionally chartered public corporation to promote the national coordination of accreditation."[85]

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[83] Report of the Advisory Committee, The Role and Function of the National Commission on Accrediting, p. 9.

[84] Lloyd H. Elliott, "Accreditation or Accountability: Must We Choose?" (Paper delivered at the meeting of the Middle States Association of Collegiate Registrars and Officers of Admissions, Atlantic City, N. J.)

Seidman has discounted the possibility of a Congressionally chartered public corporation on the grounds that he does not believe Congress would intervene because the proposed delegation of powers to such an entity could not be "reconciled with the principle that accreditation should be conducted by nongovernmentally controlled agencies or organizations." Moreover, Seidman points out that Congress would be reluctant to intervene in disputes among private groups. Such proposals are premature, he said, and raise serious constitutional questions. He urges, as the first step, the reform and reorganization of the National Commission on Accrediting and the regional associations.[86]

As a beginning step toward reforming the existing system, Seidman has suggested merging the National Commission on Accrediting and the Federation of Regional Accrediting Commissions of Higher Education. This, he contends, would enhance the relative power of the institutions vis-a-vis the specialized agencies. He suggests that the new organization should not recognize any accrediting agency whose decisions and policies on accreditation are subject to review and approval by governing bodies of professional associations with potentially conflicting interests.

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[85] U. S. Department of Health, Education, and Welfare, Report on Licensure and Related Health Personnel Credentialing, p. 72.

[86] Harold Seidman, "Accreditation of Postsecondary Education: Problems in Organization," Part I: Staff Working Papers, Accreditation of Health Educational Programs, pp. 12-14; Memorandum to William K. Selden, July 22, 1971. [Dr. Seidman served for many years on the staff of the U. S. Bureau of the Budget, retiring as assistant director for management and organizations. He is the author of Politics, Position, and Power: The Dynamics of Federal Organization; co-author of The Government Corporation].

The Study of Accreditation of Selected Health Educational Programs (SASHEP) recommended that

> Accreditation should be coordinated, monitored and supervised by a national, independent body, governed by a policy board composed primarily of individuals who represent the public interest and, in addition, individuals who may be directly associated with institutions, their programs of study, the professions, and the civil government.[87]

The SASHEP Commission amplified its intent by stating:

> In order to assure that the decisions of this policy board shall be made within the context of the welfare of society, and in order to reduce the possibilities of conflicts of interest, the majority of the membership should be composed of individuals who are unlikely to gain personally by the decisions of the board.[88]

All the proposals emphasize the role of the national body in protecting the public interest in accreditation. Implicit also in the proposals is the role the national body needs to assume in providing a leadership function and in requiring coordination and articulation between institutional and specialized accreditation.

In considering the creation of a comprehensive national body envisioned by the above proposals, it is important to remember that society is not irretrievably relinquishing its authority over how accreditation is to be organized and conducted. Other factors in a democratic society will continue to exert an important influence, as Kaplin has pointed out.

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[87] Commission Report, Study of Accreditation of Selected Health Educational Programs, p. 25.

[88] *Ibid*., p. 26.

The Courts and Accreditation

Kaplin has noted that the courts and the legislatures are, after all, the ultimate formulators of public policy.[89] What the courts say about accreditation is sure to influence, if not determine, many of the activities and policies of accrediting agencies. For the focus of this study, it is important to note what the courts and legal scholars have said about accreditation as it relates to public interest and society.

As previously noted, Kaplin and Hunter, studying the legal status of accrediting agencies, wrote in 1966 that accrediting agencies operate in an area of vital concern to the public.[90] Accreditation litigation since that time emphasizes that accrediting decisions are also of vital concern to institutions, so much so that they are willing to do battle in the courts. Two important cases have been decided which have strong implications for the organization of accreditation.

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[89] William A. Kaplin, "The Law's View of Professional Power: Courts and the Health Professional Associations," Part II: Staff Working Papers, Accreditation of Health Educational Programs, p. J-1.

[90] William A. Kaplin and J. Philip Hunter, "The Legal Status of the Educational Accrediting Agency: Problems in Judicial Supervision and Governmental Regulation," Cornell Law Quarterly, p. 104.

In the first of these, Parsons College v. North Central Association, the court chose mainly to determine whether North Central had followed its own stated rules and procedures in making the accreditation decision and whether Parsons had been afforded "rudimentary due process."[91] The court deferred to the expertise of North Central with regard to the validity of its accrediting standards as well as the accreditation decision. This is significant in that Parsons attacked North Central standards as nebulous, vague, and unintelligible to men of ordinary intelligence. The court took another view, however, holding that

> ...the standards of accreditation are not guides for the layman but for professionals in the field of education. Definiteness may prove, in another view, to be arbitrariness. The Association was entitled to make a conscious choice in favor of flexible standards to accommodate variations in purpose and character among its constituent institutions, and to avoid forcing all into a rigid and uniform mold.[92]

The Court further declined to intrude into the North Central decision by stating:

> The public benefits of accreditation, dispensing information and exposing misrepresentation, would not be enhanced

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[91] For a discussion of the case, see William A. Kaplin, "The Parsons College Case," Journal of Higher Education, pp. 543-554.

[92] 271 F. Supp. 65 (N.D. Ill, 1967), p. 73.

> by judicial intrusion. Evaluation by the peers of the college, enabled by experience to make comparative judgments, will best serve the paramount interest in the highest practicable standards in higher education...[93]

The Court's decision has been interpreted by some as justifying the exclusion of public or lay members from service on bodies making decisions on whether to accredit or reaccredit institutions or programs of study. Such decisions, they argue, would be more readily challengeable in the courts if public or lay members were taking part. These same individuals argue, however, that public or lay representatives could serve on national bodies which establish overall policy for accreditation.[94]

In the most recent litigation, Majorie Webster Junior College v. Middle States Association of Colleges and Secondary Schools, the District Court was not hesitant to involve itself in the standards of accrediting agencies. It classified Middle States' refusal to consider Marjorie Webster's application for accreditation because the college did not comply with Middle States' nonprofit criterion as "arbitrary, discriminatory and unreasonable."[95]

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[93] Ibid., p. 74.

[94] Federation of Regional Accrediting Commissions of Higher Education, A Report on Institutional Accreditation in Higher Eduction, p. 11.

[95] Marjorie Webster Junior College, Inc., v. Middle States Association of Colleges and Secondary Schools, Inc., 302 F. Supp. 459, 468 (D.D.C. 1969).

The District Court decision was later overturned by the appellate court which took a different view of the reasonableness of the Middle States' criterion. The appellate court held that Middle States' exclusion of Marjorie Webster solely on the basis of its proprietary character was not beyond the bounds of Middle States' allowable discretion.

In analyzing the significance of the case, Kaplin stated that:

> ...the history of the case suggests that the standards by which higher education is governed may come under increasing scrutiny by the courts, as well as by the higher educational community itself. The extensive litigation and the public debate it fostered have brought some of the searching questions of governance to the fore. While their solution is a matter initially and primarily for the accrediting agencies themselves...the courts can nevertheless play an important role when alleged solutions, or their lack, subject institutions or the public to arbitrary and unreasonable exercise of accrediting power...For the first time accrediting agencies have been termed (although the appellate court "assume(d) without deciding") quasi-governmental organization, limited by the Constitution.[96]

Kaplin's analysis of the Marjorie Webster appellate decision led him to state in that "other cases, with different factual records or different accrediting judgments at issue, or simply with less 'differential' courts, the same legal principles could be used to reach different conclusions."[97] He stressed the validity of the District Court's exhortation to accrediting agencies. That exhortation, delivered by Judge John Lewis Smith, Jr., declared that accreditation has been established in the public mind as a mark of distinction and quality; in view of this great reliance placed upon accreditation by the public and the government, Judge Smith asserted that these associations must orient their policies toward the broader welfare of society and the public interest.[98]

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[96] William A. Kaplin, "The Marjorie Webster Decisions on Accreditation," Educational Record, p. 223. Also see 432 F. 2d, 658.

[97] Loc. cit., p. 223.

Whatever the legal merits of the district and appellate court decision on Marjorie Webster, the lower court decision, although overturned, has exerted, and will continue to exert, a strong influence on the future course of accreditation by virtue of the fact that it so forcefully and logically sets forth the public trust responsibilities of accrediting agencies. Its influence also was enhanced because it coincided with a growing recognition and concern over the broad impact on society of private agencies and associations.

Kaplin, in a recent analysis of the courts' view of the public impact of the professional association, states that a potential conflict of interest inheres when professional associations represent not only the broad interests of society but also the narrow interests of their members.[99] Clearly, setting and enforcing educational standards is one area in which the activities of professional associations have an impact on society. Thus, Kaplin states:

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[98] Marjorie Webster Junior College, Inc. v. Middle States Association of Colleges and Secondary Schools, Inc. 302F. Supp. 470 (D.D.C. 1969).

> When the professional association is actually relying upon its expertise, it is genuinely fulfilling its standard-setting role and is likely to be operating in the public interest. When considerations other than expertise influence professional action, the association may be acting primarily as a professional 'union' for its members, and it is less clear that societal interests are being served.[100]

Drawing on a body of "private association" law, Kaplin suggests that the courts are not likely to intervene in the affairs of associations when they can be reasonably assured that the concepts of professional autonomy and expertise are not being abused. They may step in, however, when there is an "overriding public interest" which transcends the particular interest of the association and when the association is not relying on expertise or its expertise is inadequate for the task at hand.[101] He points out that the expertise of social and applied sciences may be needed to solve some problems as well as the "moderating influence of lay opinion." He cited the Marjorie Webster litigation as indication that public concern regarding accreditation is indeed leading to increasing judicial concern.[102]

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[99] William A. Kaplin, "The Law's View of Professional Power: Courts and The Health Professional Association," Part II: Staff Working Papers, Accreditation of Health Educational Programs, p. J-8.

[100] Ibid., p. J-8.

[101] Ibid., p. J-12.

What Kaplin concludes regarding public scrutiny of the activities of the health professions is probably equally applicable to all accrediting associations and agencies:

> Such scrutiny does not presage an end to professional autonomy nor an undermining of professional expertise; it only suggests that the deference which is accorded autonomy and expertise will be weighed in the future against a broader backdrop of public interest factors.[103]

Thus, it would appear that the courts have set some guidelines, if not sounded some warnings, to which accrediting agencies will be required to adhere in the future.

Summary

A survey of the literature on accreditation reveals its widespread impact upon American society. It exerts substantial influence on educational policy and practices. It determines eligibility for billions of dollars of funding. Graduation from accredited programs is essential in many professions and occupations in order to obtain licensure to practice. Similarly, other employment opportunities are affected. Accredited status is virtually essential for the continued and successful operation of institutions of postsecondary education.

As a result, there is a growing body of thought questioning the organization and uses of accreditation. It is often termed a quasi-governmental function exercised by private groups. Increasingly, accreditation leaders and other writers are calling for wider participation in the governance of accreditation to include representatives of the public. Occasionally, they also specify representatives of federal and state governments as well. Additionally, they are questioning any single profession's or group's claim to exclusive expertise in a given field.

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[102] Ibid., p. J-12.

[103] Ibid., p. J-29.

The literature indicates a need for a change in the organization of accreditation in order that the process can retain its credibility and remain a nongovernmental function.

CHAPTER III

METHODOLOGY AND DATA GATHERING

This study involved three phases: (1) the development of a list of functions that accreditation should serve and a statement of principles that should characterize its organization, (2) a survey of relevant literature on the organizational problems in accreditation, and (3) a survey and an analysis of the current organizational structure of accreditation to identify changes needed to bring it into conformity with the statement of principles.

Development of List of Functions and Statement of Organizational Principles

A modification of the Delphi procedure was used to develop a list of functions of accreditation and a statement of principles that should characterize its organization. The Delphi procedure was developed and refined by Olaf Helmer and his colleagues at the RAND Corporation as a means of making systematic use of the knowledge of groups of experts.[1] They used the procedure to develop forecasts which were not possible through mathematical or other scientific models and for consensus research.

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[1] Olaf Helmer, Social Technology, pp. 11, 97.

Richard E. Peterson has explained the use of the procedure and described it as follows:

> 1. Participants are asked to list their opinions on a specific topic, such as recommended activities or predictions for the future.
>
> 2. Participants are then asked to evaluate the total list against some criterion, such as importance, chance of success, etc.
>
> 3. Each participant receives the list and a summary of the responses to the items and if in a minority, is asked to revise his opinion or indicate his reason for remaining in the minority.
>
> 4. Each participant again receives the list, an updated summary of minority opinions, and a final chance to revise his opinions.

Thus, the Delphi method has the potential for providing:

1. a range of ideas about goals
2. priority rankings of the goals
3. a degree of consensus about goals[2]

The Delphi procedure has received limited use in education. It has been used to develop statements of goals for institutions of higher education,[3] in educational planning as related to manpower needs, in a study of faculty work load, and in a study of intramural dental practice (treatment of private patients for pay by dental faculty).[4] Helmer confirmed the limited use of the technique in education.[5] Concurrent with its employment in this study, the Delphi procedure is being used by the National Center for Higher Education Management Systems of the Western Interstate Commission for Higher Education in the development of a system for planning and management in higher education.[6]

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[2] Richard E. Peterson, The Crisis of Purpose: Definition and Uses of Institutional Goals, p. 9.

[3] Ibid.

Uhl, while cautioning that the technique might need modification, indicated value in applying it to situations in higher education.[7] Dalkey, who has conducted methodological studies of the technique has found it superior in effectiveness to face-to-face discussion by groups of experts; Martino found the technique reliable in his studies of the procedure.[8]

Given its success record in studies requiring expert opinion, the procedure with slight modifications seemed ideal for application in this study. It should be noted that this study was concerned with (1) establishing principles instead of goals, and (2) stimulating thoughtful consideration of the organizational structure and functions of accreditation instead of reaching consensus.

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[4] Alex J. Ducanis, "The Possible Uses of the Delphi Technique in Institutional Research and Planning in Higher Education," Communication of Institutional Research: Proceedings of the Tenth Annual Forum, p. 154.

[5] Olaf Helmer, Telephone Interview, May 17, 1971.

[6] National Center for Higher Education Management Systems, Western Interstate Commission for Higher Education, Newsletter, April 7, 1972.

[7] Norman Uhl, "A Technique for Improving Communication Within an Institution," Communication of Institutional Research: Proceedings of the Tenth Annual Forum, p. 54.

[8] Ducanis, op. cit., p. 155.

Selection of Delphi Participants

A list of potential Delphi participants, numbering approximately 200, was compiled from a variety of sources. The criteria used for inclusion on the potential participant list were (1) persons judged to possess knowledge about the functions, limitations, organization, strengths and weaknesses of accreditation, and (2) persons engaged in accreditation as full-time employees, as officers of accrediting agencies, or as employees of institutions who participate in accrediting activities. Names, positions, and addresses of the individuals were placed on cards and subgrouped as follows:

> Group I.--Administrators of accredited institutions and persons from agencies accrediting proprietary institutions, the National Commission on Accrediting, the regional associations, and specialized accrediting agencies.
>
> Group II.--Persons from educational associations, federal government, foundations, legal profession, professional associations, state government, faculty, and students.

The Executive Director of the National Commission on Accrediting, the Director of the Study of Accreditation of

Selected Health Educational Programs, and the Director of the Accreditation and Institutional Eligibility Staff of the U.S. Office of Education formed a jury to assist in the selection of those to be invited to participate. Every individual on the list of potential participants was known to at least one member of the jury; most were known by at least two, and several were known by all three.

Using a scale of one to three, the members of the jury rated the individuals known to them on the basis of their potential contributions to the Delphi project. An arithmetical average of the ratings assigned was computed. Invitations to participate were issued on the basis of the highest arithmetical averages. The process resulted in a reasonably diverse group of participants as can be seen by examining Appendix A, "List of Delphi Participants Who Completed One or More of the Project Phases."

The percentages relating to acceptance of invitations to participate and phases completed in the project are detailed in Table 1, page 74.

Development of Initial Delphi Document

A draft of the initial document was developed by the project director. It contained a list of functions which accreditation serves or was being asked to serve and a series of proposed statements relating to how accreditation should

TABLE 1

RESPONSES TO INVITATION TO PARTICIPATE AND RESPONSES TO DELPHI DOCUMENTS

	GROUP I	%	GROUP II	%	TOTAL	%
Invited to participate	56		56		112	
Agreed to participate	55	(98.2)	51	(91.1)	106	(94.6)
Resigned during project	3	(05.5)	2	(03.9)	5	(04.7)
Listed as participants at conclusion of project	52	(94.5)	49	(96.1)	101	(95.3)
Listed as participants at conclusion who completed one or more phases	48	(92.3)	49	(100.0)	97	(96.0)
Documents returned by those listed as participants at conclusion of project:						
Phase I	46	(88.5)	45	(91.8)	91	(90.1)
Phase II	47	(90.4)	48	(98.0)	95	(94.1)
Phase III	48	(92.3)	45	(91.8)	93	(92.1)
TOTALS	141	(90.4)	138	(93.9)	279	(92.1)

be organized. The list of functions of accreditation was compiled from the literature and from the project director's informal discussions with leaders in accreditation. The original list of principles was compiled in similar fashion: (1) suggestions or inferences drawn from the literature on accreditation, and (2) ideas advanced in informal discussions between the project director and leaders in accreditation.

The second round of inputs into the project was made by a five-person jury, all of whom had accepted invitations to participate in the project. They included the Executive Director of the National Commission on Accrediting, the President of The George Washington University, the Director and Assistant Director of the Accreditation and Institutional Eligibility Staff of the U.S. Office of Education, and the Director of the Study of Accreditation of Selected Health Educational Programs.

The group responded to the initial draft of the document for Phase I of the project. From the responses of the jury, the document was redesigned and revised with several statements relating to organization being added. It was then ready for use in Phase I.

Role of Participants and Phases in the Delphi Procedure

Participants in the project were asked to contribute their thinking in light of their knowledge of accreditation, its functions, limitations, organization, strengths, and weaknesses as follows:

Phase I.--Participants were sent the document containing (1) a list of the functions of accreditation, and (2) a series of statements of principles pertaining to the organization of nongovernmental postsecondary accreditation. The Delphi group was asked to:

> (1) List of Functions of Accreditation.--(a) Rate each of the functions of accreditation on a continuum of primary, secondary, desirable by-product, unimportant and inappropriate, (b) add other functions which are appropriate, and (c) provide a brief statement giving rationale for each rating of each function of accreditation, and
>
> (2) Statement of Principles.--Using the rated list of functions of accreditation as a reference, (a) add statements which should be included and provide a brief rationale for so doing, and (b) indicate agreement or disagreement with each statement in the document, providing a brief rationale statement for each choice.

From the returns, the following were developed for inclusion in the document for use in Phase II:

(1) List of Functions of Accreditation.--This section included a comprehensive listing of all the functions of accreditation cited and provided a summary of the rationales for each ranking.

(2) Statement of Principles.--This section included a comprehensive listing of the statements of principles cited and provided a summary of rationales presented for each

principle, both pro and con. (A summary of the rationales is presented in Chapter IV.)

Phase II.--The document resulting from Phase I was mailed to the Delphi group to:

> (1) List of Functions of Accreditation.--React to the comprehensive list of functions in light of the summaries provided on the following continuum: primary, secondary, desirable by-product, unimportant, and inappropriate, with the items in the continuum to be interpreted as follows:
>
> Primary-Function should be given primary consideration in the organization of accreditation.
>
> Secondary-Function is important but should be given secondary consideration in the organization of accreditation.
>
> Desirable By-Product-Function is useful but its importance would not warrant conducting accreditation solely for this purpose. It should be given third-level consideration in the organization of accreditation. (Functions considered undesirable by-products should be rated inappropriate.)
>
> Unimportant-Function is unimportant to society in general and should be given no consideration in the organization of accreditation.
>
> Inappropriate-Function is inappropriate for accreditation and should be discouraged in the organization of accreditation.
>
> (2) Statement of Principles.--(a) React to the comprehensive list of statements of principles on the following scale: strongly agree, agree, no opinion, disagree, strongly disagree, and (b) Choose among alternate statements which had been posed as a result of conflicting opinions advanced in the initial round by the Delphi participants.

From the returns, the following were developed for inclusion in a document to be used in Phase III:

(1) List of Functions of Accreditation.--Through the assignment of weights to items on the scale, the responses were tabulated to categorize the functions that accreditation should serve under the following headings: primary, secondary, desirable by-product, and inappropriate. Functions which received an average response of the weight assigned to unimportant or inappropriate were dropped from the list. The functions and the majority and minority supporting rationales are included in Chapter IV.

(2) Statement of Principles.--Through the assignment of weights to items on the scale, the responses were tabulated. Statements which received an average response equal to or higher than the weight assigned to agree were retained in the statement of principles. The two alternate statements receiving the highest number of choices but not a majority in each category in Phase II were repeated in Phase III document. This procedure was followed to assure that all statements in the final list would have majority approval of the Delphi group. (These tabulations can be found in Chapter IV, Table 2.)

Phase III.--The document resulting from Phase II was mailed to the Delphi group to:

(1) List of Functions of Accreditation.--Inform them of the levels of importance assigned to the various functions

of accreditation by the participants.

(2) Statement of Principles.--React, in light of the above, to the statements of principles as revised in Phase II on the following scale: essential, highly important, important, and (b) Choose among the alternate statements.

Phase IV.--From the responses received in Phase III, a statement of principles which should characterize the organization of accreditation in relation to its functions was formulated. The statements can be found in Chapter IV.

Mechanics of the Delphi Procedure

Several techniques were used to make participation in the Delphi procedure as convenient as possible. Return postage paid cards were included for response purposes in the mailing inviting the members to participate. Return postage paid envelopes were enclosed with Phase I, Phase II, and Phase III mailings for the convenience of the participants in returning their responses. In addition, during each phase the response of every participant was acknowledged with appropriate thanks. Reminders were sent to each participant who failed to respond by the established deadline for each of the phases.

As a means of guarding against ambiguous instructions, the participants were regularly invited to call the project director collect if they had questions concerning any aspect of the project. No calls were received.

Techniques Used in Analyzing and Organizing Delphi Data

The following techniques were used in organizing and analyzing the Delphi project data:

Rationale Statements.--The rationale statements presented by the participants in Phase I to support their ratings on the scales or continuums had to be summarized and tabulated for use in Phase II of the project. The method of accomplishing this objective was a simplified approach to content analysis.[9]

Each rationale statement was analyzed to extract each idea or concept which was advanced to support the ratings assigned to the statements in the Delphi documents. The ideas or concepts were noted in tabular form for each statement and grouped according to levels of support or opposition to the statements. Since one of the objectives of the Delphi procedure is to expose the participants to a wide range of thinking without prejudicing their succeeding responses by informing them of percentages of fellow participants who agree or disagree with the ideas or concepts in question, there was no need to tabulate the number of times an idea or concept was cited.

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[9] David J. Fox, The Research Process in Education, pp. 646-79.

The concepts and ideas were then summarized in narrative form according to levels of support or opposition for presentation in Phase II.

Weighting of Scale Responses.--To determine which statements should be retained in the List of Functions of Accreditation and the Statement of Principles, numerals were assigned to each point on the scale for the purpose of computing an arithmetical average. The cutoff used was the midpoint of the desired interval.

Comparison of Responses to Delphi Items.--For both the list of functions and the statement of principles, the Delphi participants were required to rank statements on a continuum. It was desirable to test the responses to determine if there were statistically significant differences between the responses of Group I and Group II. In addition, in those cases in which the participants were asked to choose between alternate statements, it was desirable to determine whether there were statistically significant differences in the choices of the two groups.

In both situations, the Chi Square (X^2) Test was applied to compute a value for comparison at the .05 level of significance. The Chi Square values and corresponding .05 significance figure at the appropriate degree of freedom can be found in Tables 2 and 4.

The Chi Square tables used were those found in Statistics.[10]

Survey of Relevant Literature

A survey of the literature deemed relevant to this study was made. This included books and articles on accreditation which were helpful in developing a historical perspective for the study. Numerous articles, papers, speeches, and a few books were reviewed to help clarify the problem on which this study focuses. Court opinions and articles by legal scholars were surveyed to round out the public interest dimension of the problem and issues. Review of some official documents and correspondence of accrediting agencies was essential for a fuller understanding of the problem as were studies of accreditation and government reports. (See Chapter II.)

Survey of the Purposes and Organization of Accrediting Agencies

To ascertain the stated purposes for accrediting and the organizational elements of accrediting agencies within the scope of this study, the constitutions and/or bylaws of some agencies were examined. In the case of the regional associations, the study relied on an in-depth and comprehensive analysis of the regional associations by Claude E. Puffer and associates.[11] Data gathered by the study director for analysis in the Study of Accreditation of Selected Health Educational Programs[12] were utilized for many of the accrediting agencies in the health fields.

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[10] William L. Hays, Statistics, pp. 675-76.

The above was supplemented by two rounds of telephone interviews with executives or officers of the recognized accrediting agencies. Each of the interviewees later checked for accuracy the organizational data contained in Tables 7 through 10. Statements of purposes for accrediting were subjected to content analysis for reclassification among the Delphi statements.

Evaluation of the Organizational Structure of Accrediting Agencies

The statement of principles for the organization of nongovernmental accreditation was used as criteria to evaluate the current organizational structure of accrediting agencies included within the scope of this study. Points of conformity and variances were noted and used in formulating the conclusions and recommendations of the study.

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[11] A study conducted by Claude E. Puffer and associates resulted in a comprehensive document outlining in detail the procedures, decision-making processes, and organizational structure of the regional accrediting associations.

[12] The study director was assistant director of the Study of Accreditation of Selected Health Educational Programs. See Jerry W. Miller, "Structure of Accreditation of Health Educational Programs," Part I: Working Papers, Accreditation of Health Educational Programs, pp. B-1 to B-38.

Comments on the Delphi Procedure

The Delphi procedure was found to be an extremely useful tool for the purposes of this project. It provided extensive interaction among a group of informed and knowledgeable individuals and resulted in the collection of a valuable body of thought.

For this project, the process had these advantages:

1. It was low cost but not inexpensive in comparison with the high cost which would have been involved in bringing such a prestigious group of individuals together for face-to-face discussions.
2. It permitted the participation of extremely busy individuals, many of whom probably would not have otherwise participated. Given four to six weeks to respond, even the busiest of the group was able to find time to complete the Delphi documents as the high percentage of returned documents indicates.
3. It also permitted time for more serious reflection and better articulated responses than face-to-face discussions probably would have afforded.

For this Delphi group and this project, the procedure had these limitations:

1. The positions and responsibilities of the participants made it necessary to compress the procedure into three rounds or phases. It was not believed practical to ask the participants for more time for fear that this would diminish their participa-

tion and enthusiasm for the project. More rounds would have been desirable to refine and elucidate the statements.

2. The specificity being sought in the Delphi statements required highly structured documents which probably resulted in less freedom for participant responses. A few participants expressed resentment of the technique which forced them to choose between or among alternate statements.
3. Undoubtedly some of the forcefulness and logic of the participant responses were lost in the summarization. Yet, the utility of the responses to the participants required this step as did the manageability of the project.

On the basis of the experience with the Delphi procedure in this project, these comments are offered:

1. There was no evidence to suggest disagreement with the generally listed advantages and disadvantages of the procedure.
2. A small but carefully chosen Delphi population will probably produce just as satisfactory results as a larger population.
3. The procedure would appear to have wide applicability in education where objective answers to problems are not possible and where expert subjective judgments and opinions can contribute to solutions.

CHAPTER IV

DEVELOPMENT OF LIST OF FUNCTIONS OF ACCREDITATION AND STATEMENT OF PRINCIPLES WHICH SHOULD CHARACTERIZE ITS ORGANIZATION

Introduction

As has been previously noted, accreditation has been developed and organized in the United States as the result of well defined social forces and political values. These very same factors are, in current times, exerting pressures for change in the organization of nongovernmental accreditation. Furthermore, social forces and political values in a democratic society seem likely to determine the organization of accreditation in the foreseeable future.

Thus, research--to have an impact on the organizational problems of nongovernmental accreditation--had to be conducted within the above context. Data gathering needed to stress the empirical approach, building on the experiences, observations, and thoughtful consideration of individuals who were knowledgeable about accreditation, its functions and uses, limitations, organization, strengths, and weaknesses as well as how it fits into the social and political system of the United States.

The Delphi procedure was selected as the most practical means of data gathering and facilitating an exchange of ideas among a population of experts. The methods of identifying these experts, the procedures for their interaction, and the criteria and means of handling the data were described in Chapter III.

The following sections of Chapter IV present the tabulated and synthesized data gathered from the Delphi population regarding the list of functions of accreditation and the statement of principles which should characterize its organization.

Functions of Accreditation

In a democratic society, the functions served by accreditation should be a major factor in determining its organizational structure. Accordingly, the Delphi procedure was structured so the functions accreditation should serve for society were determined prior to the final formulation of the statement of principles that should characterize its organization.

Functions of accreditation are variously referred to in the literature as uses, purposes, functions, and objectives. In attempting a systematic categorization, it proved more efficient to classify these designations as functions. For example, many segments of society, including government, make considerable use of accreditation status granted by nongovernmental agencies. All of these could be covered under one function: to identify for public purposes educational institutions and programs of study which meet established standards of educational quality.

The Phase I Delphi document listed nine functions of accreditation. Participant responses during Phase I resulted in three of the nine being retained as initially stated, one being rephrased, one being rephrased as two separate functions, and four functions being combined into two statements. In addition, seven new functions were suggested by the participants.

Participant responses in Phase II resulted in a hierarchal list of functions which accreditation serves or should attempt to serve for society. The functions, listed in descending order of importance to society, are designated primary, secondary, or desirable by-products. The emphasis on these functions varies among the types of accrediting agencies, and the institutions and programs of study they serve. The list should not be interpreted to mean that accreditation, as it is currently organized and operated, is capable of serving equally well all the functions listed. Some of the functions may lie more in the realm of goals for accreditation.

Following each function, which is underlined, is a synthesis of rationales advanced by the Delphi participants to support their rankings of each function. Two syntheses are listed: the majority view and the minority view(s). It was impossible to equate precisely the concepts and ideas advanced in the rationales with points on the scale, i.e., "primary," "secondary," "desirable by-product." Therefore, a great deal of discretionary judgment had to be used in formulating the syntheses of the responses.

For a detailed listing of the rankings of each function, the weighted averages, and the Chi Square (X^2) analysis factor, see Table 2, pp. 90-94.

List of Functions Which Accreditation Should Serve or Attempt to Serve

The list of functions which accreditation should serve or attempt to serve as determined by the Delphi participants is as follows:

Primary

1. To identify for public purposes educational institutions and programs of study which meet established standards of educational quality.

Majority View.--The orderly functioning of society requires some means of identifying educational institutions and programs of study which meet acceptable standards of educational quality. Such identification is likewise important for the general development and improvement of education. Making such determinations lies beyond the competence of most individuals and

TABLE 2

DELPHI PARTICIPANT RATINGS OF FUNCTIONS OF ACCREDITATION AND CHI SQUARE [X^2] VALUES

PRIMARY

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average*	X^2 Value
1. To identify for public purposes educational institutions and programs of study which meet established standards of educational quality									
GROUP I	40	5	2	0	0	0	47	4.81	
GROUP II	46	2	0	0	0	0	48	4.96	
TOTAL	86	7	2	0	0	0	95	4.88	
	(2 x 2 Table; .05 Significance Level - 3.84)								1.58
2. To stimulate improvement in educational standards and in educational institutions and programs of study by involving faculty and staff in required self-evaluation, research, and planning									
GROUP I	34	5	5	0	3	0	47	4.43	
GROUP II	35	6	7	0	0	0	48	4.58	
TOTAL	69	11	12	0	3	0	95	4.51	
	(2 x 3 Table; .05 Significance Level - 5.99)								.27

*Intervals for weighted average:
Primary----------5.00 to 4.50
Secondary--------4.50 to 3.50
Desirable
By-Product------3.50 to 2.50
Unimportant or
Inappropriate---2.50 and below

SECONDARY

3. To assist in the development of processes and instruments to evaluate institutions and programs of study and their educational achievements

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average *	χ^2 Value
GROUP I	16	14	16	1	0	0	47	3.96	
GROUP II	28	9	11	0	0	0	48	4.35	
TOTAL	44	23	27	1	0	0	95	4.16	
	(2 x 3 Table; .05 Significance Level - 5.99)								5.18

4. To provide assurances regarding curricula, policies, practices, and requirements which enhance acceptance and cooperation and facilitate transfer of credit among a variety of types and levels of institutions

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average *	χ^2 Value
GROUP I	17	21	6	0	3	0	47	4.04	
GROUP II	18	22	7	1	0	0	48	4.19	
TOTAL	35	43	13	1	3	0	95	4.12	
	(2 x 3 Table; .05 Significance Level - 5.99)								.02

5. To provide reasonable assurance that practitioners whose activities have a direct bearing on the public health and safety, or whose activities could cause irreparable harm to society, meet minimum educational standards upon entry into the profession

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average *	χ^2 Value
GROUP I	21	15	6	1	4	0	47	4.02	
GROUP II	20	11	10	0	7	0	48	3.77	
TOTAL	41	26	16	1	11	0	95	3.89	
	(2 x 4 Table; .05 Significance Level - 7.81)								2.43

6. To identify for public purposes educational institutions and programs of study which adhere to accepted ethical standards in business relationships with students

GROUP I	15	15	15	0	1	1	47	3.93	
GROUP II	13	16	14	2	2	1	48	3.77	
TOTAL	28	31	29	2	3	2	95	3.85	
	(2 x 5 Table: .05 Significance Level - 9.49)								.52

7. To protect institutions and programs of study against external and internal interference by groups and individuals who seek to control, distort, or divert the educational function to serve partisan interests or purposes

GROUP I	12	19	13	0	3	0	47	3.79	
GROUP II	15	13	17	1	2	0	48	3.79	
TOTAL	27	32	30	1	5	0	95	3.79	
	(2 x 4 Table: .05 Significance Level - 7.81)								2.20

8. To identify for public purposes educational institutions and programs of study which are making efficient use of their resources in meeting their stated goals and objectives

GROUP I	11	13	19	1	3	0	47	3.60	
GROUP II	9	17	13	0	8	1	48	3.40	
TOTAL	20	30	32	1	11	1	95	3.50	
	(2 x 4 Table; .05 Significance Level - 7.81)								4.05

DESIRABLE BY-PRODUCTS

9. To serve as a medium of communication for educational practices and ideas among institutions, individuals, and programs of study through widespread participation in the accreditation process

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average *	x^2 Value
GROUP I	6	12	29	0	0	0	47	3.51	
GROUP II	4	10	31	3	0	0	48	3.31	
TOTAL	10	22	60	3	0	0	95	3.41	
	(2 x 3 Table; .05 Significance Level - 5.99)								.64

10. To assist institutions and programs of study in obtaining resources needed to offer quality education by providing independent professional judgments

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average *	x^2 Value
GROUP I	8	15	22	1	1	0	47	3.60	
GROUP II	4	13	25	1	5	0	48	3.21	
TOTAL	12	28	47	2	6	0	95	3.40	
	(2 x 5 Table; .05 Significance Level - 9.49)								4.45

11. To provide on a comparative basis information to the public about accredited institutions and programs of study

	Primary	Secondary	Desirable By-Product	Unimportant	Inappropriate	No Opinion	Total	Weighted Average *	x^2 Value
GROUP I	10	7	7	4	17	2	47	2.75	
GROUP II	11	14	9	1	12	1	48	3.23	
TOTAL	21	21	16	5	29	3	95	3.00	
	(2 x 6 Table; .05 Significance Level - 11.07)								5.73

INAPPROPRIATE

12. To stimulate understanding and acceptance of a discipline, further its cause, and maintain a professional identity

GROUP I	2	5	21	2	17	0	47	2.43	
GROUP II	1	5	17	9	16	0	48	2.29	
TOTAL	3	10	38	11	33	0	95	2.26	
	(2 x 5 Table; .05 Significance Level - 9.49)								5.11

13. To enforce social policy as established by federal legislation

GROUP I	0	4	3	2	36	2	47	1.44	
GROUP II	2	16	6	0	22	2	48	2.48	
TOTAL	2	20	9	2	58	4	95	1.98	
	(2 x 4 Table; .05 Significance Level - 7.81)								11.65

14. To increase educational and employment opportunities in institutions for minorities and for females

GROUP I	0	4	19	2	22	0	47	2.11	
GROUP II	1	2	16	0	28	1	48	1.89	
TOTAL	1	6	35	2	50	1	95	2.00	
	(2 x 3 Table; .05 Significance Level - 5.99)								1.58

15. Dropped from consideration:
To provide educational goals for institutions and programs of study and their personnel

GROUP I	9	10	14	1	11	2	47	3.11	
GROUP II	6	9	16	3	12	2	48	2.87	
TOTAL	15	19	30	4	23	4	95	2.99	
	(2 x 6 Table; .05 Significance Level - 11.07)								1.87

organizations. Due to the diversity of educational institutions and programs of study and the lack of state or federal responsibility in this area, society in the United States is served best by having nongovernmental accreditation perform this function. The wide utilization of accredited status demands that this be a primary function of accreditation.

Minority View.--This function is important to society but not as important as stimulation of improvement in educational institutions and programs of study, which should be the primary function of accreditation.

2. To stimulate improvement in educational standards and in educational institutions and programs of study by involving faculty and staff in required self-evaluation, research, and planning.

Majority View.--To make accreditation a useful enterprise, stimulation of improvement in educational institutions and programs of study must be a primary function. This function is of extreme importance to marginal and developing institutions; it helps to maintain a questioning attitude which militates against the natural inclination of quality institutions to become self-satisfied. Accreditation is the only force external to an institution which requires periodic, systematic self-evaluation and research by the faculty and staff. The process generates enthusiasm for improvement and a favorable climate for change. Even though the standards may be challenged, the accreditation process forces healthy introspection.

Minority Views.--(1) This is not accreditation's reason for being. Its impact on the better institutions and programs of study is limited though some stimulation of improvement does result. Few institutions are sufficiently secure to reveal all their weaknesses to accrediting teams; the self-study process does not guarantee an in-depth and comprehensive evaluation.

(2) There is a conflict of interest set up by combining a "yes-no" test of accreditation with a client-serving function of assisting institutions and programs of study with improvement because it is now possible to cut off major funding by denial of accreditation. Consequently, institutions are less inclined to be forthright with accrediting agencies.

The real stimulus for improvement would come as the result of making harsh and stringent judgments of value, not by offering advice.

Secondary

3. To assist in the development of processes and instruments to evaluate institutions and programs of study and their educational achievements.

Majority View.--Evaluation is the essence of the accreditation process and, therefore, is the central activity of accrediting agencies. Accrediting agencies are obligated to use their expertise to assist the educational community to develop more imaginative and accurate evaluative processes and instruments.

4. To provide assurances regarding curricula, policies, practices, and requirements which enhance acceptance and cooperation and facilitate transfer of credit among a variety of types and levels of institutions.

Majority View.--Accreditation enhances a relatively free movement of students among a variety of institutions which can cooperatively assist them in attaining their educational objectives. It does this by providing reasonable assurances regarding the academic integrity and requirements of institutions. Accreditation thus serves society by providing a system of interchangeable parts which works reasonably well. The alternatives would be likely to have little inter-institutional cooperation or state-prescribed curricula and practices.

Minority View.--This is essentially a by-product of accreditation. Accreditation testifies only to the quality of institutions and their programs, not to the competence of individuals. The receiving institution must still satisfy its admissions policies in terms of the individuals.

5. To provide reasonable assurance that practitioners whose activities have a direct bearing on the public health and safety, or whose activities could cause irreparable harm to society, meet minimum educational standards upon entry into the profession.

Majority View.--Protection of the public is a primary responsibility of accreditation. One means of protecting the public is to provide assurances that graduates of educational programs meet minimal educational standards upon entry into the profession. In carrying out this function, accreditation can provide reasonable but not absolute assurance that graduates are professionally competent. It accomplishes this objective by assuring that institutions can be relied upon to award credentials only to professionally competent individuals. This is a primary function of specialized accreditation; institutional accreditation has limited utility in this respect. In some fields, it is necessary to utilize accreditation in conjunction with licensure and certification to protect the public adequately. In fields where there are strong certification, licensure, or registration requirements, accreditation must be maintained to guard against educational institutions and programs of study giving consideration only to the educational requirements for those credentials.

Minority View.--Attempting to protect the public health and safety through accreditation is inappropriate. Protection of the public is a function of government which requires proscriptive and prescriptive actions and public accountability. Accreditation's criteria are much too general to be able to protect the public health and safety. Licensure, certification, and registration, which test the individual, alone can serve this function.

6. To identify for public purposes educational institutions and programs of study which adhere to accepted ethical standards in business relationships with students.

Majority View.--Ethical considerations are fundamental to the proper functioning of a quality institution or program of study. Quality education is dependent upon a sense of professionalism on the part of faculty and staff. Professionalism in turn inherently involves a commitment to high ethical standards and principles. Therefore, accreditation must be concerned with ethical and business relationships. Furthermore, because of lack of government policing of dishonest and unethical practices, it is socially desirable that accreditation exercise this function. This function should be the primary concern of institutional accreditation, an especial concern of agencies accrediting proprietary institutions, and a secondary concern of specialized accrediting agencies.

Minority View.--Accreditation can foster ethical practices but procedurally it cannot assure them. It is logistically impossible for accrediting agencies to handle each specific complaint, which enforcement requires. Accrediting agencies should be concerned in a general way with the ethics of accredited institutions and programs but this cannot be its primary focus.

7. To protect institutions and programs of study against external and internal interference by groups and individuals who seek to control, distort, or divert the educational function to serve partisan interests or purposes.

Majority View.--Legal and financial control of institutions often work to block or neutralize institutional efforts to resist harmful external and internal interference with legitimate institutional objectives and purposes. Professional judgments with regard to such situations, exercised and implemented through the accreditation process, often can be the only defense against such interference. Respected professional and peer judgments cannot be successfully opposed for very long. To serve this function effectively, accreditation must engage in this activity only sparingly and with great discretion. Otherwise, the whole process would lose credibility and be viewed as a protective association.

Minority View.--This function is the proper role of a board of trustees. Institutions, to be strong and effective, must be able singularly to defend their policies and practices and not rely on an outside prop. Moreover, this function can be used to protect educational institutions from constructive pressures. Accreditation can best serve this function by evaluating the institution and making the report public. Corrective actions, whether they are taken in favor of the institution or against the institution, will likely result and be in the public interest.

8. To identify for public purposes educational institutions and programs of study which are making efficient use of their resources in meeting their stated goals and objectives.

Majority View.--The public, with the growing disparity between funds available and those needed, should be informed as to which institutions and programs of study are making the most effective use of resources available to them. Accreditation can aid in providing accountability for higher education by serving this function. It can provide some measure of assurance regarding the quality of management, i.e., efficient use of resources by an institution, but its ability to do so is limited.

Minority View.--Accreditation can foster efficiency in education but its evaluative process is too limited to provide many assurances or to make public pronouncements in this regard. Making judgments on institutional efficiency might destroy the effectiveness of accreditation to determine educational quality. As it is currently organized, accreditation does not have the ability to make these judgments.

Desirable By-Products

9. To serve as a medium of communication for educational practices and ideas among institutions, individuals, and programs of study through widespread participation in the accreditation process.

Majority View.--Those who participate in the evaluation function develop a broader perspective of higher education because they are exposed to good ideas and practices. The accreditation process thus serves as a communications medium, benefiting both individuals and their institutions. Consultation provided by many accrediting agencies also helps in communicating useful ideas and practices and in stimulating improvements in institutions and programs of study.

Minority View.--There are better means available to achieve this end. To the degree that it occurs, it is beneficial. However, the idea of "widespread participation" must not be interpreted to permit use of unskilled and uninformed evaluators.

10. To assist institutions and programs of study in obtaining resources needed to offer quality education by providing independent professional judgments.

Majority View.--Independent professional judgments, rendered by an agency external to the institution, can result in additional resources which make the difference between an educational program of acceptable quality and inferior offerings. Providers of funds value such judgments and are more likely to take positive action as a result.

Minority View.--Accrediting agencies are often very effective in serving this function; however, they do not always properly distinguish between the "needs" of institutions and their "wants." As in the case of determining efficiency of resource use, accreditation's ability to determine the resources needed is likewise limited. This is a case of accreditation being used in an inappropriate manner.

11. To provide on a comparative basis information to the public about accredited institutions and programs of study.

Majority View.--This is a much needed function but accreditation's ability to perform adequately in this area lies somewhere in the future. Much research will be needed to develop the tools for comparative listings.

Minority Views.--(1) Accreditation, because of the great diversity of institutions and the limitations of educational evaluation, will not be able in the foreseeable future to provide valid and reliable information about institutions and programs of study on a comparative basis. Consequently, accreditation must avoid the temptation to rank or rate institutions and their programs of study.

(2) Accrediting agencies cannot provide information which will allow comparison of institutions or programs of study with regard to hierarchies of quality. Accrediting agencies should, however, provide the public with more information about institutions than they currently do.

Inappropriate or Unimportant Functions of Accreditation

In the course of the Delphi procedure, certain functions were identified by the Delphi population as being inappropriate for accreditation to perform or unimportant to society in general. These functions and the rationales provided for their rejection, as well as the minority view, are as follows:

1. To stimulate understanding and acceptance of a discipline, further its cause, and maintain a professional identity.

Majority View.--These are inadvertent by-products of accreditation; however, accreditation should never be permitted to be conducted for these purposes alone. Conducting accreditation only for these purposes would degrade the process and be an imposition on institutions and the public. Professions and disciplines should seek to achieve these objectives through professional associations.

Minority View.--Professional pride and identity are the coordinates of quality. Accreditation promotes pride and identity among the professions and disciplines and thus is in the public interest.

2. To enforce social policy as established by federal legislation.

Majority View.--Accrediting agencies should not become enforcement agencies for the federal government. Accrediting agencies should neither impose or oppose social policy. The role of accreditation is to determine quality. To the extent that it can be shown that discrimination affects quality in education, then to that extent accreditation can rightfully be concerned. Accreditation can, and perhaps should, influence social policy but it does not have the expertise, resources, or mentality to become enforcers of the law. Requiring accrediting agencies to become enforcers of the law would be inimical to the relationships that must exist between institutions and accrediting agencies.

Minority View.--Social policy, as defined in federal legislation, is the law of the land and must be assumed to be in the public interest. Accrediting agencies purport to act in the public interest. To the extent that accrediting agencies have sought to or have been willing to be instruments of government, they must serve all the interests of government. They must, therefore, assist in enforcing social policy. Furthermore, if accreditation is to survive, it must respond to social policy.

3. To increase educational and employment opportunities in institutions for minorities and for females.

Majority View.--However desirable such objectives might be, having accreditation serve this function would subvert it from its primary focus of determining quality in education. This is a matter primarily for agencies of government and for the social consciences of individual citizens. Accreditation cannot impose quotas or standards regarding minority or female employment which have educational validity.

Minority View.--Every opportunity and available mechanism must be utilized to improve the situation in higher education as quickly as possible for minorities and females. The social conscience of the academic community can be reflected through the accreditation process.

Function Dropped Following Phase II

One function suggested during Phase I--to provide educational goals for institutions and programs of study and their personnel--proved to be open to wide interpretation. Delphi participants rejected the interpretation that accreditation should provide educational goals for institutions and their programs of study, holding that institutions should determine their own goals and objectives. Procedural limitations would not permit subsequent reactions to a rephrased statement. The function, therefore, had to be dropped from further consideration.

Statistically Significant Differences Between Group I and Group II Responses to Functions of Accreditation

Using the Chi Square analysis, one statistically significant difference (at the .05 level) was found in the responses of Group I and Group II to the statements setting forth the functions of accreditation. The groups differed substantially in their responses to the statement "to enforce social policy as established by federal legislation."

Thirty-six of the forty-seven members of Group I rated the statement as an inappropriate function of accreditation; two others in Group I indicated that it was unimportant for accreditation to serve this function. No members of Group I rated it as a primary function of accreditation and only four ranked it as a secondary function of accreditation. Three listed it as a desirable by-product.

In contrast, two members of Group II rated it as a primary function, sixteen as a secondary function, and six as a desirable by-product. Twenty-two of the forty-eight members in Group II listed it as an inappropriate function.

Neither group ranked the function high enough--on the basis of a weighted average--to retain it in the list of functions which accreditation should serve or attempt to serve for society.

No other statistically significant differences were found among the responses of the two groups to the other statements relative to the functions of accreditation.

Organizational Principles for Accreditation

The second step in all the Delphi phases was designed to collect opinion regarding how accreditation should be organized to carry out the functions it assumes in society in the United States. The intent of the second step of the project was to develop a series of statements which would be generally applicable to nongovernmental accreditation and which could be used as criteria to evaluate the current organizational structure of accrediting agencies.

The Phase I document contained eight philosophical statements, eight statements relating to coordination, supervision, and monitoring of accreditation, and three statements relating specifically to the organization of accrediting agencies. During the Delphi process, eleven of the statements were retained with modifications, two were combined into one statement, one was eliminated, and two statements were added. In five cases during the last two phases of the project, participants selected among alternate statements as a means of obtaining greater specificity.

Syntheses of the rationales advanced by the Delphi participants were developed for both the majority and minority viewpoints. The syntheses follow each statement of principle, which is underlined. As in the case of the rationales for the statements of functions, a great deal of discretionary judgment had to be used in formulating the response syntheses.

For a detailed listing of the ranking of each statement of principle, the weighted average, and the Chi Square

(X^2) value, see Table 3, pp. 110-119.

Principles Which Should Characterize The Organization of Accreditation

The following are a series of principles which the Delphi participants determined should characterize the organization of nongovernmental accreditation in relation to the functions it serves for society:

Philosophical Principles

1. Accreditation should serve no function which conflicts with the public interest.

Majority View.--Nongovernmental accreditation functions in the United States at the pleasure of government. At such time as the process ceases to be conducted in the public interest, it is likely that government will revoke the privileges it has tacitly granted to nongovernmental accrediting agencies. To continue to exist as a nongovernmental activity, accreditation's overriding concern, therefore, must be serving the public interest. The question then becomes what functions of accreditation serve the public interest.

Accreditation can and should be encouraged to serve both the narrow interests of private groups and the broad interests of society. Most often these two sets of interests are consonant. It is when the narrow interests conflict with the greater good that the functions of accreditation must be controlled.

TABLE 3

DELPHI PARTICIPANT RATINGS OF ORGANIZATIONAL PRINCIPLES FOR ACCREDITATION AND CHI SQUARE [X^2] VALUES

PHILOSOPHICAL

	Essential	Highly Important	Important	Unimportant	No Opinion	Total	Weighted Average*	X^2 Value
1. Accreditation should serve no function which conflicts with the public interest								
GROUP I	25	12	8	1	2	48	3.33	
GROUP II	36	5	3	0	1	45	3.81	
TOTAL	61	17	11	1	3	93	3.53	
	(2 x 4 Table; .05 Significance Level - 7.81)							7.51
2. Accreditation should be embraced in a national system, utilizing national standards and procedures								
GROUP I	14	16	12	4	2	48	2.87	
GROUP II	17	21	2	4	1	45	3.16	
TOTAL	31	27	14	8	3	93	3.01	
	(2 x 5 Table; .05 Significance Level - 9.49)							8.76
3. Unless there are valid and compelling reasons to the contrary, accreditation should be sponsored by voluntary membership associations of peer institutions with the accreditation activity organized in accordance with other principles ennunciated in this series of statements. In cases where there are valid and compelling reasons why accreditation should not be sponsored by associations of peer institutions, educators should be extensively involved in the accreditation activities								
GROUP I	28	16	2	0	2	48	3.57	
GROUP II	25	9	5	3	3	45	3.33	
TOTAL	53	25	7	3	5	93	3.45	
	(2 x 4 Table; .05 Significance Level - 7.81)							3.22

*Intervals for weighted averages:
Essential---------4.00 to 3.50
Highly Important--3.50 to 2.50
Important---------2.50 to 1.50
Unimportant-------1.50 and below

4. The policies, procedures, and standards of accreditation should be fully disclosed and developed as public business in open meetings; decisions regarding the acccredited status of institutions and programs of study should be made in executive session with the information under consideration kept confidential

GROUP I	11	17	7	0	-	35	3.11	
GROUP II	6	12	3	0	-	21	3.14	
TOTAL	17	29	10	0	-	56	3.13	
	(2 x 3 Table; .05 Significance Level - 5.99)							.48

4. ALTERNATE--Accreditation should be conducted as public business in open meetings with full disclosure of policies, procedures, standards, and decisions except in extraordinary circumstances where it is necessary to protect the rights of individuals and institutions

GROUP I	2	4	3	0	-	9	2.98	
GROUP II	8	12	4	0	-	24	3.17	
TOTAL	10	16	7	0	-	33	3.09	
	(2 x 4 Table; .05 Significance Level - 7.81)							1.58

4. RECAPITULATED

	Choose Statement Four	Choose Alternate Four	No Opinion	Total	x^2 Value
GROUP I	35	9	3	47	
GROUP II	21	24	1	46	
TOTAL	56	33	4	93	
	(2 x 3 Table; .05 Significance Level - 5.99)				11.40

5. There should be two types of accreditation, institutional and specialized. (a) Institutional accreditation should certify the overall quality and integrity of the institution. It should be adequate to serve the public interest except for programs requiring specialized accreditation for reasons stated in "b" as follows. (b) Specialized accreditation should be conducted for educational programs preparing practitioners whose activities have a direct bearing on the health and safety of the public or whose activities could cause irreparable harm to individuals or society

GROUP I	8	17	4	0	-	29	3.14	
GROUP II	8	13	2	0	-	23	3.26	
TOTAL	16	30	6	0	-	52	3.19	
	(2 x 3 Table; Significance Level - 5.99)							.55

5. ALTERNATE--There should be two types of accreditation, institutional and specialized. (a) Institutional accreditation should certify the overall quality and integrity of the institution. It should be adequate to serve the public interest except for programs requiring specialized accreditation for reasons stated in "b" below. (b) Specialized accreditation should be conducted for educational programs preparing practitioners whose activities require specialized expertise and in cases where the educational community feels the direct improvement of the educational program will result

GROUP I	3	10	5	0	-	18	2.89	
GROUP II	5	12	3	1	-	21	3.00	
TOTAL	8	22	8	1	-	39	2.95	
	(2 x 3 Table; .05 Significance Level - 5.99)							1.11

5. RECAPITULATED

	Choose Statement Five	Choose Alternate Five	No Opinion	Total	x^2 Value
GROUP I	29	18	1	48	
GROUP II	23	21	1	45	
TOTAL	52	39	2	93	
	(2 x 3 Table; .05 Significance Level - 5.99)				.82

6. Accreditation should be coordinated, monitored, and supervised by an independent nongovernmental body with membership from institutions, institutional accrediting agencies, specialized accrediting agencies, professional groups, and the public

GROUP I	12	10	5	0	-	27	3.26	
GROUP II	9	13	8	1	-	31	2.97	
TOTAL	21	23	13	1	-	58	3.10	
	(2 x 3 Table: .05 Significance Level - 5.99)							1.43

6. ALTERNATE--Accreditation should be coordinated, monitored, and supervised by a voluntary federation of specialized accrediting agencies, institutional accrediting agencies, institutions, and members of the public

GROUP I	7	8	4	0	-	19	3.16	
GROUP II	3	3	4	0	-	10	2.90	
TOTAL	10	11	8	0	-	29	3.07	
	(2 x 4 Table: .05 Significance Level - 7.81)							1.48

6. RECAPITULATED

	Choose Statement Six	Choose Alternate Six	No Opinion	Total	X^2 Value
GROUP I	27	19	2	48	
GROUP II	31	10	4	45	
TOTAL	58	29	6	93	
	(2 x 3 Table: .05 Significance Level - 5.99)				3.60

7. The membership of the national body to coordinate, monitor, and supervise accrediting agencies should be composed of one-third public representatives and two-thirds professional educators

GROUP I	4	18	9	1	-	32	2.78	
GROUP II	7	13	9	1	-	30	2.87	
TOTAL	11	31	18	2	-	62	2.82	
	(2 x 4 Table; *.05 Significance Level - 7.81)*							1.60

7. ALTERNATE--The membership of the national body to coordinate, monitor, and supervise accrediting agencies should be composed of an equal number of public representatives and professional educators

GROUP I	2	7	6	0	-	15	2.73	
GROUP II	1	7	6	1	-	15	2.53	
TOTAL	3	14	12	1	-	30	2.63	
	(2 x 3 Table; .05 Significance Level - 5.99)							.25

7. RECAPITULATED

	Choose Statement Seven	Choose Alternate Seven	No Opinion	Total	X^2 Value
GROUP I	32	15	1	48	
GROUP II	30	15	0	45	
TOTAL	62	30	1	93	
	(2 x 2 Table; .05 Significance Level - 3.84)				.02

8. The national body should derive its authority from acting in the public interest

GROUP I	33	9	3	2	1	48	3.55	
GROUP II	33	7	4	0	1	45	3.66	
TOTAL	66	16	7	2	2	93	3.60	
	(2 x 4 Table; .05 Significance Level - 7.81)							.34

9. The national body should enforce its decisions through the weight of public sanctions

GROUP I	14	19	10	1	4	48	3.05	
GROUP II	18	18	8	0	1	45	3.23	
TOTAL	32	37	18	1	5	93	3.14	
	(2 x 4 Table; .05 Significance Level - 7.81)							2.37

10. The national body should provide general leadership for nongovernmental accreditation through sponsorship and conduct of studies, seminars, and other activities designed to enhance the ability of nongovernmental accreditation to serve the public interest

GROUP I	12	29	7	0	0	48	3.10	
GROUP II	22	16	7	0	0	45	3.33	
TOTAL	34	45	14	0	0	93	3.22	
	(2 x 3 Table; .05 Significance Level - 5.99)							6.57

11. The national body should recognize agencies to grant institutional and specialized accreditation

GROUP I	32	11	4	0	1	48	3.60	
GROUP II	31	10	3	0	1	45	3.64	
TOTAL	63	21	7	0	2	93	3.62	
	(2 x 4 Table; .05 Significance Level - 7.81)							.11

12. All types of postsecondary education accrediting agencies, without regard to types and levels of institutions they serve, should be considered for recognition by the national body

GROUP I	27	13	5	2	1	48	3.38	
GROUP II	24	14	5	1	1	45	3.39	
TOTAL	51	27	10	3	2	93	3.38	
	(2 x 5 Table; .05 Significance Level - 9.49)							.52

13. The national body should develop its policies, procedures, and criteria for recognition in open forum, providing for input and discussion by accrediting agencies and interested members of the public

GROUP I	24	19	5	0	0	48	3.40	
GROUP II	28	12	4	1	0	45	3.49	
TOTAL	52	31	9	1	0	93	3.44	
	(2 x 3 Table; .05 Significance Level - 5.99)							1.79

14. The national body should finance its operations by means of a surcharge on accrediting fees and/or budgets of agencies it recognizes to grant institutional and specialized accreditation

GROUP I	6	7	14	1	-	28	2.64	
GROUP II	4	9	9	1	-	23	2.70	
TOTAL	10	16	23	2	-	51	2.67	
	(2 x 4 Table; .05 Significance Level - 7.81)							1.30

14. ALTERNATE--The national body should finance its operations by means of fees levied directly on institutions

GROUP I	3	4	7	1	-	15	2.60	
GROUP II	3	2	6	1	-	12	2.58	
TOTAL	6	6	13	2	-	27	2.59	
	(2 x 4 Table; .05 Significance Level - 7.81)							.43

14. RECAPITULATED

	Choose Statement Fourteen	Choose Alternate Fourteen	No Opinion	Total	X^2 Value
GROUP I	28	15	5	48	
GROUP II	23	12	10	45	
TOTAL	51	27	15	93	
	(2 x 3 Table; .05 Significance Level - 5.99)				2.36

15. The organization of the accrediting agencies the national body recognizes should reflect extensive use of professional judgment and expertise

GROUP I	33	11	3	1	0	48	3.58	
GROUP II	25	12	5	1	2	45	3.42	
TOTAL	58	23	8	2	2	93	3.51	
	(2 x 4 Table; .05 Significance Level - 7.81)							1.35

16. The organization of the accrediting agencies the national body recognizes should include laity who are capable of (a) contributing effectively to the accrediting enterprise, and (b) relating the activities of the accrediting enterprise to the public interest

GROUP I	22	16	8	2	0	48	3.21	
GROUP II	15	19	10	1	0	45	3.07	
TOTAL	37	35	18	3	0	93	3.14	
	(2 x 4 Table: .05 Significance Level - 7.81)							2.12

17. Agencies recognized by the national body should reflect a willingness to abide by policies and procedures promulgated by the national body which ocordinates, monitors, and supervises nongovernmental accreditation

GROUP I	30	12	6	0	0	48	3.50	
GROUP II	29	13	2	1	0	45	3.51	
TOTAL	59	25	8	1	0	93	3.53	
	(2 x 3 Table: .05 Significance Level - 5.99)							1.82

18. Agencies recognized by the national body should provide for implementation of due process guarantees for both rulemaking and the adjudicatory aspects of accreditation

GROUP I	34	12	2	0	0	48	3.67	
GROUP II	35	5	2	1	2	45	3.72	
TOTAL	69	17	4	1	2	93	3.69	
	(2 x 3 Table: .05 Significance Level - 5.99)							2.44

Nongovernmental accreditation occupies a position in society similar to educational institutions and their programs of study that have been created to serve the public interest and are therefore a public trust. Accreditation, which must serve educational institutions and their programs, is an extension of that public trust concept. It would be illogical for accreditation to serve any function which conflicts with the public interest.

Admittedly, this statement and line of reasoning presents the dilemma of defining or determining the public interest. But this is a problem with which all aspects of a democratic society must continually grapple. Accreditation is no exception. Even though the public interest can never be defined or determined to the satisfaction of all members of society, the quest to serve this ever-shifting ideal is of critical importance, both to accreditation and society in general.

Minority View.--The principal function of accreditation is to give an expert estimate of the quality of an institution or its programs of study and to validate the worth of its degrees or diplomas. In educational matters, it is too easy to equate the public interest with public opinion which spawns many conflicting demands and interests and which could be imposed upon institutions and their programs of study through accreditation. Too many groups purport to speak for the public interest. The term in this context is too encompassing to be distinguishing. It also can be dangerous. Preoccupation with serving the public interest could evolve accreditation into a political game with educational values being lost in the process. This could result in governmental values or policies being forced upon educational institutions.

2. Accreditation should be embraced in a national system, utilizing national standards and procedures.

Majority View.--Current societal needs require a national system of accreditation. A mobile society, the commonality of educational goals, and the national uses of accreditation are contributing factors. Regionalism is no longer an important force in American society. Intraregional differences among institutions are often greater than interregional differences. Higher education is a national resource and enterprise and must be evaluated on a national basis. A national system does not preclude regional administration to enhance flexibility in the accreditation process. A national system should provide for coordination and cooperation to enable institutional and specialized accreditation to work effectively and efficiently together in the best interests of institutions, programs of study, and society.

Minority View.--A national system would ultimately result in a large bureaucracy and become as undesirable as a federal system of accreditation. A national system increases the likelihood that accreditation would come under the *de facto* if not the *de jure* control of the federal government. Politicization of higher education could result. A national system implies a super association with standards-setting responsibility and control by the higher education establishment. In view of the history of discrimination against proprietary institutions, such a system would be unacceptable to these institutions. Diversity among institutions and in educational practices would suffer.

3. *Unless there are valid and compelling reasons to the contrary, accreditation should be sponsored by voluntary membership associations of peer institutions, with the accreditation activity organized in accordance with other principles enunciated in this series of statements. In cases where there are valid and compelling reasons why accreditation should not be sponsored by associations of peer institutions, educators should be extensively involved in the accreditation activities*.

Majority View.--Sponsorship of the accrediting process by peer institutions is the best means of avoiding an undesirable degree of control of the education program by the government or by a particular profession. In education for the professions, educators, who are also professionals in the field, are in the best position to understand both the needs and requirements of the profession and the educational process needed to produce professionals. Practitioners and other interests should participate in the accreditation process and policy making, however, but not as the primary sponsors.

Minority View.--The above point of view represents a long-standing bias that representatives of institutions know what is best for society and the professions. Establishing and maintaining educational standards for their future members are the rights and responsibilities of the professions. This helps to keep education for the professions relevant to the needs of the practitioners. Educators should participate but their sponsorship of the accrediting process creates a situation which borders on a conflict of interest.

4. The policies, procedures, and standards of accreditation should be fully disclosed and developed as public business in open meetings; decisions regarding the accredited status of institutions and programs of study should be made in executive session with the information under consideration kept confidential.

Majority View.--Accreditation will be strengthened by establishing policies, procedures, and standards as a public business in open meetings. All policies, procedures, and standards should be fully disclosed and made available to any interested party. This practice would provide assurances tc the public that accreditation operates in the public interest.

The nature of accreditation and the accreditation process requires, however, that certain proceedings be conducted in executive session with selected information being kept confidential. In some cases, public release of some information--

basic to the accreditation decision--would violate the rights of individuals and be detrimental to the best interests of institutions. This does not negate the need to observe fully due process procedures and to respect the right of the institution to make public the report of the accrediting agency.

Moreover, it would be difficult to obtain good professional decisions in open meetings. Professionals, who must provide the essential ingredient of professional judgment and expertise, would hesitate to participate in open meetings for fear that their actions would be open to distortion and misinterpretation by the unsophisticated. Furthermore, unless some confidentiality is required, it would be difficult for accrediting agencies to obtain information from institutions on which to base their decisions. This is already a problem because some institutions fear loss of accreditation and thus loss of eligibility for federal funds.

Minority Views.--(1) In situations where it is necessary to protect the rights of individuals or institutions, accreditation decisions should be reached in executive session. However, once the decision is made, it should be disclosed fully along with the appropriate data to support the decision. In other cases, the accrediting decision can be made in a public meeting without harming individuals or the institution. In such cases, accreditation meetings should be open to all interested parties.

(2) If accreditation is to serve a public function, its proceedings should be open to the public. There is no other way of assuring that the public interest will be served. Only then will the public have complete confidence in accreditation. Making accreditation decisions in public meetings would do much to inform the public about higher education, result in greater public support, and alleviate much of the criticism which is now being leveled at accreditation. Public disclosure of all the pertinent data would be the greatest possible incentive for institutions to improve.

5. There should be two types of accreditation, institutional and specialized. (a) Institutional accreditation should certify the overall quality and integrity of the institution. It should be adequate to serve the public interest except for programs requiring specialized accreditation for reasons stated in "b" as follows. (b) Specialized accreditation should be conducted for educational programs preparing practitioners whose activities have a direct bearing on the health and safety of the public or whose activities could cause irreparable harm to individuals or society.

Majority View.--Functionally and pragmatically, two types of accreditation are required. Special assurances must be provided regarding the quality of educational programs preparing some practitioners. It is beyond the capability of institutional accreditation to provide the extensive and intensive evaluation required for certain professional programs preparing practitioners whose activities have a direct bearing upon the public health and safety. Specialized accreditation and the certification, licensure, and registration processes are complementary functions needed to protect the public in certain fields. Furthermore, specialized accreditation serves as an effective balance to institutional accreditation by dimming the halo of certain prestigious institutions and by brightening the halo of some which are less well known. The professions must not abdicate their traditional roles and responsibilities in assuring the quality of education provided their future members. Society would eventually be harmed by taking away the participation of the professions in the evaluation of educational programs.

Care must be exercised to assure that specialized accreditation does not proliferate or be misused, however. Also, there should be more coordination and articulation between specialized and institutional accreditation.

Minority View.--(1) Limiting accreditation to "programs preparing practitioners whose activities have a direct bearing on the health and safety of the public or whose activities could cause irreparable harm to individuals or society" is too limiting; specialized accreditation can be socially desirable even when the health and safety of the public are not involved. It should be available to unique programs or for programs whose activities require specialized expertise and in cases where the educational community feels that direct improvement of the educational process will result. Moreover, institutional accreditation does not imply similarity of aims, uniformity of process, or comparability of graduates which are needed in some fields.

(2) There should be only institutional accreditation. Assuring that practitioners in professional fields are properly educated should be the function of licensure, certification, or registration. Specialized accreditation is the instrument of the professions to force institutions to conform to their wishes and to limit entry into the field. Professional programs can be evaluated adequately through institutional accreditation.

Principles Relating to Coordination, Monitoring, and Supervision of Accreditation

6. Accreditation should be coordinated, monitored, and supervised by an independent nongovernmental body with membership from institutions, institutional accrediting agencies, specialized accrediting agencies, professional groups, and the public. (See Table 4, p.128).

Majority View.--One must agree with the nongovernmental approach to the coordination, monitoring, and supervision of accreditation. To disagree, is to agree that this should become a governmental function or that there should be no attempt at all at monitoring, coordinating, and supervising accrediting agencies. Experience has indicated that such activities are essential to prevent duplication and proliferation and to assure some consistency in practice and a code of ethics.

TABLE 4

GROUPS TO BE REPRESENTED IN MEMBERSHIP OF NATIONAL COORDINATING BODY

In Phase II, Delphi participants selected by majority vote groups which should be represented on the national body to coordinate, monitor, and supervise accreditation. The groups nominated in Phase I and the votes received in Phase II are listed below. Forty-eight votes were needed to obtain a majority.

Public	86
Institutional Accrediting Agencies	84
Specialized Accrediting Agencies	75
Institutions	65
Professional groups	58
Federal Government	40
Student Groups	38
Faculty Organizations	35
Education Commission of the States	35
State Government	27

Coordination, monitoring, and supervision by an agency of government could result in rigid control of the accrediting process for government purposes with higher education becoming politicized. The agency which performs these functions should be broadly representative to guard against control by narrow interests.

Minority Views.--(1) The functions of monitoring, coordinating, and supervising accreditation should be carried out by an agency of government. Only governmental agencies can provide assurances that they will operate in the public interest because only they are accountable through the democratic process. Where public monies are at stake, this must be a government function. Government can delegate the actual accreditation operation but it must retain final responsibility.

(2) The idea of a national body is undesirable even if it is nongovernmental. It, too, would likely become a bureaucratic maze. This approach should be no more trusted with regard to freedom of education than government control.

(3) The absolute autonomy of accrediting agencies must be preserved. This makes monitoring and supervision by the national body unacceptable. Coordination--if that implies assisting and assuring consistency in procedures and practices and enhancing cooperation among agencies--is necessary and acceptable.

7. The membership of the national body to coordinate, monitor, and supervise accrediting agencies should be composed of one-third public representatives and two-thirds professional educators.

Majority View.--No fixed quotas or proportion of membership on the national body are required. The mix of approximately one-third public representatives and two-thirds professional educators appears to be reasonable as a general principle. Broad representation is essential among the professional educators to assure input from those concerned primarily with education for the professions as well as institutional administrators.

Establishing accreditation policy and evaluating the activities of accrediting agencies requires professional knowledge of the educational endeavor. Public representatives need to be present not to outvote the educators but to articulate the broad concerns of the public with the accreditation process. The ultimate check on the national body will be the courts or Congress. A majority of public representatives is not required to provide accountability.

Minority Views.--(1) The national body is to be responsible for establishing general policy for all of accreditation, not for making professional judgments regarding the accredited status of specific programs and institutions. Its role will be comparable to that of the board of trustees of institutions of higher education where laity establishes policy and objectives and the professionals implement. Therefore, a majority of public representatives would not hamper the national body in achieving its objectives.

Furthermore, there is no other way of assuring that the decisions will be in the public interest other than to have a majority of public members. Our whole society is built on distrust of anyone purporting to make decisions in the public interest who potentially stands to gain from those decisions. Having a majority of public representatives on the national body would enhance the credibility of accreditation because it would provide the check on the professionals who must carry out the actual accreditation process.

(2) There must be supervision of accrediting agencies to prevent duplication, proliferation, and to assure consistency in practice and ethics. These functions should be lodged in a body responsible to and controlled by the institutions which are subjected to accreditation.

8. _The national body should derive its authority from acting in the public interest_. [1]

Majority View.--Public acceptance of actions and decisions is the ultimate base of authority in a democratic society, either for governmental or nongovernmental agencies. Lacking statutory authority, the nongovernmental national body can gain its authority only from acting in the public interest. Interests participating in the national body will be forced to conform and to subordinate their interests to the greater public good.

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[1] For a definition of "public interest" and "public sanctions," see p. 7.

It would be undesirable to establish any body which can dictate matters relating to standards in education. Such actions should have to stand the test of the marketplace to assure that they will be in the public interest. It would, likewise, be undesirable to give the national body statutory standing for this would effect too close ties with government and provide excuses for governmental intervention.

Minority Views.--(1) The national body must derive its authority from the constituencies it serves--institutions and accrediting agencies. Hopefully, it will act in the public interest.

(2) No one gets much authority from acting in the public interest. The authority the national body holds should be statutorily based. Such statutes should clearly define and limit the authority of the national body to assure that it operates independently of government and does not oppress the accreditation process.

9. The national body should enforce its decisions through the weight of public sanctions.[2]

Majority View.--A nongovernmental agency can enforce its decisions only through public sanctions. Authority tied only to public acceptance and conformance to its decisions will keep the national body desirably flexible, nonbureaucratic, and responsive to public needs. Public pressure to conform to the policies of the national body, focused in institutional refusal to support nonrecognized accrediting agencies, will be sufficient powerbase. If the agency acts in the public interest, professional groups will be under strong pressure to cooperate and operate within the national body's policies and procedures.

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[2] Ibid.

Minority View.--The concept of public sanctions is too closely allied with public opinion. Moreover, public sanctions do not represent sufficient authority for the national body to enforce its policies and decisions. These can only be enforced by institutions boycotting nonrecognized accrediting agencies.

10. The national body should provide general leadership for nongovernmental accreditation through sponsorship and conduct of studies, seminars, and other activities designed to enhance the ability of nongovernmental accreditation to serve the public interest.

Majority View.--To provide leadership for the continuous improvement of accreditation will be an essential function of the national body. Only as a result of such a critical mass of leadership are accrediting standards and procedures likely to be improved. The national body should also concentrate on communication among accrediting agencies and institutions. It should attempt to create a better understanding of accreditation--its capabilities and limitations--among the public and federal and state governments.

Minority View.--This suggests a broader role than is needed and might result in too much power accruing to the national body. A coordinating, monitoring, and recognition function should be the focus of the national body. Other agencies should carry out the functions listed above.

11. The national body should recognize agencies to grant institutional and specialized accreditation.

Majority View.--The recognition function is the one mechanism through which the national body can exert control of accreditation. Through institutional adherence to the recognized list, the national body can control proliferation in accreditation, coordinate and supervise accrediting agencies, and assure the integrity of the accreditation process.

Minority Views.--(1) The national body should establish a forum for accreditation, coordinate accrediting agencies, but not have the power of recognition. This function should rest with the U.S. Commissioner of Education. From the point of view of proprietary education, this is preferred over other forms of recognition which have historically discriminated against proprietary institutions.

(2) The recognition function should rest with both the national body and the U.S. Commissioner of Education. This would continue to provide two means of legitimatizing accrediting agencies and prevent the centering of too much power in any one agency.

12. All types of postsecondary education accrediting agencies, without regard to types and levels of institutions they serve, should be considered for recognition by the national body.

Majority View.--Educational legislation now covers public, private and proprietary education. The states are authorizing degree-granting privileges to proprietary institutions in increasing numbers. These factors, along with student mobility and new emphasis for awarding credit for knowledge gained in all types of educational settings, require that there be a national system of accreditation which includes all types of postsecondary educational endeavors. Moreover, if accreditation is to provide a measure of protection for the public, it is mandatory that it be comprehensive in coverage.

Minority View.--Accreditation should be limited to programs and institutions covered under a strict definition of higher education. Proprietary institutions should be licensed, not accredited. Peer group evaluation is not practical for such institutions because it is self-serving.

13. The national body should develop its policies, procedures, and criteria for recognition in open forum, providing for input and discussion by accrediting agencies and interested members of the public.

Majority View.--The legitimacy and acceptability of the functions and actions of the national body will be enhanced as a result of conducting its business in the most open manner possible. Furthermore, this would be recognition of the public responsibilities of the national body. Accrediting agencies to be recognized by the national body need to be assured that they will have opportunity to provide input; governance is by consent. The quasi-governmental functions of accreditation argue strongly for this approach but this does not mean that those participating in the open forum vote on the decisions.

14. The national body should finance its operations by means of a surcharge on accrediting fees and/or budgets of agencies it recognizes to grant institutional and specialized accreditation.

Majority View.--There are no absolute equitable means of financing the national body or any means of totally insulating it from financial pressures short of an adequate endowment. Since not all agencies charge fees to institutions or programs, the surcharge on accrediting fees and/or budgets appears to be a reasonable approach. It would be consistent for the agencies and institutions which are to conduct their activities in the public interest, to support an organization whose primary function is to assure that accreditation operates in the public interest. Government financing would bring government control; foundation support is unlikely and uncertain. The body should be free to accept funds from other sources providing the funds do not jeopardize its independence.

Minority Views.--(1) There are several possibilities for financing the national body. A combination of surcharges on the budgets of accrediting agencies and a second fee levied directly on institutions would provide a balanced approach.

(2) The body should assess accredited institutions and programs directly to free it from reliance upon the agencies which it recognizes. It is proper for institutions to pay for this public service. Charges should be made to institutions on the basis of full-time equivalent enrollment to cover institutional accreditation and enrollment in programs holding specialized accreditation to cover specialized accreditation.

Principles Relating to Organization of Accrediting Agencies

15. The organization of the accrediting agencies the national body recognizes should reflect extensive use of professional judgment and expertise.

Majority View.--Given the imprecise nature of the educational process, there is no other way to evaluate education but to rely extensively upon professional judgment and expertise. Even when more objective measurements are available, their application and interpretation will require professional judgment and expertise. If accreditation did not rely heavily upon these ingredients, professionals would start their own competing agencies. Acceptance of the accreditation decision makes professional judgment and expertise mandatory.

Minority View.--Some will seize upon this statement to justify relying upon professional expertise and judgment to the exclusion of moderating lay opinion. Participation by laity is required to keep the professionals honest.

16. The organization of the accrediting agencies the national body recognizes should include laity who are capable of (1) contributing effectively to the accrediting enterprise, and (2) relating the activities of the accrediting enterprise to the public interest.

Majority View.--The leavening influence of laity would do much to allay apprehensions and to generate renewed support for the accreditation process. Laity would help agencies to be always conscious of the public interest, extend public understanding of accreditation, and gain support for postsecondary education. Lay participation is critical to the credibility of accreditation. It will also add perspective by presentation of noninstitutionalized views. Laity perhaps can contribute more to institutional accreditation than to specialized.

Minority Views.--(1) Including lay participation at the policy-making level is an excellent idea; laity should not, however, be included on visiting teams or become involved in making judgments on professional and technical matters. Until there are clearer signals from the courts, the role of laity may have to be limited.

(2) Laity should be consulted and their advice sought but they should not be placed in the position of voting on accreditation policy or decisions. Their participation is not required to assure that accreditation will operate in the public interest; professionals are also concerned about the public interest.

17. Agencies recognized by the national body should reflect a willingness to abide by policies and procedures promulgated by the national body which coordinates, monitors, and supervises nongovernmental accreditation.

Majority View.--If accreditation as a national system is to work, self-discipline and cooperation of all parties must prevail. National policies and procedures are essential with regard to a code of ethics, to provide consistency, and to provide assurances regarding the integrity of the accreditation process. Order in accreditation is necessary for the effective administration of postsecondary institutions.

Minority View.--The recognized agencies should be required to abide by the policies and procedures of the national body; relying on self-discipline and cooperation would produce chaos and anarchy in accreditation. If agencies have the opportunity for input and are actually represented in the organization of the national body, they should have no choice but to adhere.

18. Agencies recognized by the national body should provide for implementation of due process guarantees for both rulemaking and the adjudicatory aspects of accreditation.

Majority View.--Due process should infuse the entire accreditation process. Due process procedures will greatly enhance the reliability of accreditation and its responsiveness to the public interest. Providing such guarantees will tend to keep the courts out of accreditation issues.

Minority Views.--(1) Due process guarantees are protected by the courts and those aggrieved by accrediting agencies can take their cases to the judicial system. Overconcern with due process will tie accreditation up in a legal morass to the extent that it will not be able to function quickly and decisively.

(2) Some term other than due process should be used. This is too legalistic and will encourage litigation and obstinacy in the accreditation process. The intent is to provide adequate notice and hearing.

Relative Worth of Statements of Organizational Principles

The Delphi participants tended to give a high ranking of importance to all the statements of principles relating to the organization of accreditation. Six statements received average ratings of essential with the remaining twelve receiving average ratings of highly important.

The statements receiving the strongest support on the basis of weighted averages dealt with implementation of due process guarantees by accrediting agencies and performance of a recognition function by the national body. Of least concern to the Delphi participants were how the national body should be financed and the exact proportion of public representative membership on the national body.

Statistically Significant Differences Between Group I and Group II Responses To Statements of Organizational Principles

Using the Chi Square analysis, one statistically significant difference (at the .05 level) was found between the responses of Group I and Group II to the statements setting forth organizational principles for accreditation. Group II attached more importance to the role the national body should play in providing general leadership for nongovernmental accreditation. Twenty-two members of Group II compared to twelve in Group I rated the role "essential." Sixteen members of Group II rated the role "highly important" compared with twenty-nine in Group I. Seven members of each group assigned the role to the third level of significance - "important." (See statement 10, Table 3, p. 115).

One statistically significant difference, also at the .05 level, was found in the choices of the two groups to alternate statements. Thirty-five members of Group I chose the statement which would limit decision-making on the accredited status of institutions and programs to executive sessions and which would keep the information under consideration confidential, as compared to twenty-one in Group II. Twenty-four members of Group II and only nine of Group I chose the statement opting for a more public approach to decision-making in accreditation. (See statements 4; 4 alternate, and 4 recapitulated, Table 3, p. 111).

CHAPTER V

FUNCTIONS AND ORGANIZATION OF NONGOVERNMENTAL ACCREDITATION

Introduction

The public's interest in the functions and organization of accreditation grows proportionately with society's uses of the status granted by nongovernmental accrediting agencies. The way nongovernmental accreditation was organized or the functions it sought to serve were not of widespread interest so long as it had limited impact on society. But, as pointed out in Chapter I and Chapter II, accreditation's societal impact is no longer so limited. Society now relies on accreditation as the principal means of educational standard setting and evaluation of postsecondary institutions and their programs of study; thus accreditation's functions and organization are of increasing interest.

The focus of this study is on the relationships between the organization of nongovernmental accreditation and its functions in American society. This chapter will compare the current organization and stated functions of nongovernmental accreditation with the principles advanced by the Delphi participants. Methodology for the analysis and gathering of the data which are presented was generally described in Chapter III. That description will be amplified as appropriate in the following sections.

In the first part of this chapter, the officially stated purposes or functions of nongovernmental accrediting agencies are tabulated and reclassified in accordance with the list of functions developed in the Delphi project. The organization of nongovernmental accreditation is examined in the second section in light of the principles stated by the Delphi participants.

Functions or Purposes of Accreditation

The Delphi participants identified eight functions which nongovernmental accreditation should serve or seek to serve, and listed three more functions they considered to be desirable by-products of the accreditation process. The group identified three other functions which they considered inappropriate for nongovernmental accreditation. They also enunciated one principle with regard to the functions of accreditation: accreditation should serve no function which conflicts with the public interest.

The following examination concentrates on the stated functions and purposes of accreditation, and makes no attempt to determine whether agencies have unstated functions or purposes for accrediting.

As the review of literature in Chapter II indicated, professional groups are suspected of conducting accreditation for self-serving purposes. These purposes, if they exist, are most likely to be the ones which would be unstated and which would be adjudged to conflict with the public interest. The tacit, subtle, and unwritten understandings regarding the uses of accreditation by various groups, as opposed to its stated functions or purposes, would be involved. Analyzing the complexity of these relationships and determining whether there are _de facto_ unstated functions or purposes are beyond the practical limitations of this study.

Recognized accrediting agencies vary in their methods of stating the functions or purposes of accreditation. Some have succinctly stated lists. For others, the functions or purposes of accreditation must be construed from among a list of objectives or from official statements or documents of the accrediting agency.

For the purposes of this study, statements were gathered from several sources. Most of the agencies recognized by the National Commission on Accrediting (NCA) have cooperated with NCA in publishing _Procedures of Accrediting in the Professions_, a series of leaflets providing information about accrediting agencies and their activities and containing a statement of purposes for each agency. This series of publications was studied. In addition, functions or purposes of accrediting were discussed in telephone interviews with an official of each of the recognized agencies. Some official accrediting agency documents were also examined to determine the stated functions or purposes of accrediting. An analysis of these sources yielded a comprehensive compilation of the statements of functions or purposes for accrediting given by the recognized agencies.

Classification of Functions or Purposes

As the first step in determining their general appropriateness, functions or purposes statements were subjected to content analysis to extract each concept or idea they contained. The analysis resulted in the identification and tabulation of 32 concepts being cited a total of 186 times by the 45 recognized agencies. A complete listing can be found in Table 5.

As classified in Table 5, the 13 concepts which can be categorized as educational concerns were cited 98 times by the agencies. Thirteen others, classified as professional concerns, were cited 40 times. The remaining six concepts of a more public nature were cited 48 times.

TABLE 5

FUNCTIONS OF ACCREDITING CONCEPTS CITED BY RECOGNIZED AGENCIES

Times Cited	Educational Concepts
25	To improve education.
17	To stimulate improvement in programs and in institutions.
12	To improve standards.
9	To establish standards.
7	To cooperate with other accrediting agencies.
5	To encourage self-evaluation.
5	To encourage experimental approaches to instruction.
4	To maintain educational standards.
4	To provide guidelines for educational planning.
4	To facilitate transfer of credit.
3	To assist institutions and programs of study in achieving their objectives.
2	To seek support for the educational program from the profession.
1	To encourage the application of modern educational methods and techniques.
	Professional Concepts
17	To assure adequate educational preparation of practitioners.
6	To provide licensure or registration boards with a list of accredited schools or programs to be used in evaluating the fitness of candidates for examination.
2	To promote a better understanding of the needs of professional education in the field being accredited.
2	To stimulate understanding of the profession.
2	To identify graduates who qualify for membership in professional organizations.
2	To identify acceptable educational programs for the profession.
2	To assure sound continuing educational opportunities for the practitioner.
2	To assure that the profession will attract qualified people.
1	To promote the interests of the profession.
1	To further the cause of the profession.
1	To improve the profession.
1	To improve the services of the profession.
1	To stimulate acceptance of the profession.
	Public Concepts
35	To identify acceptable institutions and programs of study.
7	To identify for employers institutions and programs of study which produce qualified graduates.
3	To formulate and maintain ethical standards.
1	To assure government that institutions maintain acceptable standards.
1	To protect the public from financial appeals from substandard schools.
1	To cooperate with local, state, and federal educational agencies.

Reclassification Among Delphi Statements

To ascertain the general appropriateness of the functions or purposes the recognized agencies give for accrediting, the concepts tabulated in Table 5 were reclassified among the statements in the list of functions the Delphi group determined accreditation should or should not serve. The reclassification provided a reasonably comfortable but not always precise fit. For these data, see Table 6.

As reclassified in Table 6, 18 of the 32 concepts cited fall under the two primary functions of accreditation, six under secondary functions, two under desirable by-products, and six under inappropriate functions. The 18 concepts classified under primary functions were cited 140 times, those falling under secondary functions 33 times, those under desirable by-products two times, and those under inappropriate functions nine times.

Organization of Accreditation

To facilitate comparison with the statement of principles developed in the Delphi project, the following analysis of the organizational structure of accreditation has been arranged around the major points cited by the participants. These include: accreditation as a national system, sponsorship of accreditation and educator involvement, accreditation

TABLE 6

FUNCTIONS OR PURPOSES OF ACCREDITATION STATED BY RECOGNIZED AGENCIES RECLASSIFIED AMONG DELPHI STATEMENTS

PRIMARY

To identify for public purposes educational institutions and programs of study which meet established standards of educational quality.

- To establish standards.
- To maintain educational standards.
- To provide licensure or registration boards with a list of accredited schools or programs to be used in evaluating the fitness of candidates for examination.
- To identify acceptable educational programs for the profession.
- To identify acceptable institutions and programs of study.
- To identify for employers institutions and programs of study which produce qualified graduates.
- To assure government that institutions maintain acceptable standards.
- To protect the public from financial appeals from substandard schools.
- To cooperate with local, state, and federal educational agencies.

To stimulate improvement in educational standards and in educational institutions and programs of study by involving faculty and staff in required self-evaluation, research, and planning.

- To improve education.
- To stimulate improvement in programs and in institutions.
- To improve standards.
- To encourage self-evaluation.
- To encourage experimental approaches to instruction.
- To provide guidelines for educational planning.
- To assist institutions and programs of study in achieving their objectives.
- To encourage the application of modern educational methods and techniques.
- To promote a better understanding of the needs of professional education in the field being accredited.

SECONDARY

To assist in the development of processes and instruments to evaluate institutions and programs of study and their educational achievements.

None

To provide assurances regarding curricula, policies, practices, and requirements which enhance acceptance and cooperation and facilitate transfer of credit among a variety of types and levels of institutions.

- To cooperate with other accrediting agencies.
- To facilitate transfer of credit.

To provide reasonable assurance that practitioners whose activities have a direct bearing on the public health and safety, or whose activities could cause irreparable harm to society, meet minimum educational standards upon entry into the profession.

- To assure adequate educational preparation of practitioners.
- To improve the profession.
- To improve the services of the profession.

Table 6 continued

To identify for public purposes educational institutions and programs of study which adhere to accepted ethical standards in business relationships with students.

To formulate and maintain ethical standards.

To protect institutions and programs of study against external and internal interference by groups and individuals who seek to control, distort, or divert the educational function to serve partisan interests or purposes.

None

To identify for public purposes educational institutions and programs of study which are making efficient use of their resources in meeting their stated goals and objectives.

None

DESIRABLE BY-PRODUCTS

To serve as a medium of communication for educational practices and ideas among institutions, individuals, and programs of study through widespread participation in the accreditation process.

None

To assist institutions and programs of study in obtaining resources needed to offer quality education by providing independent professional judgments.

To seek support for the educational program from the profession.

To provide on a comparative basis information to the public about accredited institutions and programs of study.

None

INAPPROPRIATE

To stimulate understanding and acceptance of a discipline, further its cause, and maintain a professional identity.

To stimulate understanding of the profession.
To identify graduates who qualify for membership in professional organizations.
To assure that the profession will attract qualified people.
To promote the interests of the profession.
To further the cause of the profession.
To stimulate acceptance of the profession.

To enforce social policy as established by federal legislation.

None

To increase educational and employment opportunities in institutions for minorities and for females.

None

NOT RECLASSIFIED AMONG DELPHI STATEMENTS

To assure sound continuing educational opportunities for the practitioner.

as public business, due process in accreditation, and types of accreditation.

The analysis is limited to the points raised in the statement of principles. In some cases, as will be later elaborated, practical limitations prohibit a complete study of factors which would have made the analysis more useful.

Accreditation As a National System

The Delphi participants determined that nongovernmental accreditation should be embraced in a national system, utilizing national standards and procedures. At the head of this national system, the Delphi participants projected an independent, nongovernmental national body with the authority to coordinate, monitor, and supervise nongovernmental accreditation.

They envisioned that the national body would:

1. Have a membership from institutions, institutional accrediting agencies, specialized accrediting agencies, professional groups, and the public.
2. Have a membership composed of one-third public representatives and two-thirds professional educators.
3. Have authority derived from acting in the public interest and enforce its decisions through the weight of public sanctions.
4. Provide leadership for nongovernmental accreditation.
5. Recognize agencies to grant institutional and specialized accreditation.
6. Relate to all types of postsecondary accrediting agencies, without regard to types and levels of institutions they serve.

7. Finance its operations by means of a surcharge on the accrediting fees and/or budgets of agencies it recognizes.

The national system of accreditation envisioned by the Delphi participants implies an orderly combination or arrangement of the various elements of postsecondary accreditation into a whole, operating in reasonable harmony under universally agreed upon principles, policies, and procedures with governance by a national coordinating, monitoring, and supervising body. The national system might also imply comprehensive coverage of all types of postsecondary educational institutions and programs of study.

With the Delphi statements as a backdrop, it is now appropriate to analyze the current organization of nongovernmental accreditation as a national system. In so doing, it will be necessary to study the three primary centers of influence on agencies which accredit postsecondary education: (1) the Federation of Regional Accrediting Commissions of Higher Education, (2) the National Commission on Accrediting, and (3) the Office of the U. S. Commissioner of Education. Next, it will be necessary to examine the division of labor and cooperative working relationships among recognized accrediting agencies.

The Federation of Regional Accrediting Commissions of Higher Education (FRACHE).--FRACHE is voluntarily maintained and financially supported by the commissions on higher education of the six regional associations of colleges and schools i.e., Commission on Higher Education, Middle States Association of Colleges and Secondary Schools; Commission on Institutions of Higher Education, New England Association of Colleges and Secondary Schools; Commission on Institutions of Higher Education, North Central Association of Colleges and Secondary Schools; Commission on Higher Schools, Northwest Association of Secondary and Higher Schools; Commission on Colleges, Southern Association of Colleges and Schools; Accrediting Commission for Senior Colleges and Universities and the Accrediting Commission for Junior Colleges, both of the Western Association of Schools and Colleges.

The following elements of the Bylaws of FRACHE set forth its purposes and responsibilities:

> Article 1. 2.b. To formulate and promote a set of common principles, policies, and general procedures to be used by the accrediting commissions in their operations;
>
> Article 1. 2.c. To review and coordinate the activities of the accrediting commissions to assure consistency with these principles, policies, and general procedures.[1]

Article V of the Bylaws, entitled "Accreditation," further elucidates the relationships between FRACHE and its member commissions as well as relationships among the commissions:

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[1] Federation of Regional Accrediting Commissions of Higher Education, Bylaws, pp. 1, 3.

> Each constituent commission of the Federation shall have responsibility for the evaluation and accreditation of institutions within its own geographic area in accordance with Article I. The accreditation of an institution of higher education by one member of the Federation shall be recognized as accreditation of such institution within the area of each other member; provided, however, that such recognition shall not in any manner infringe upon the independence of each institution of higher education to choose or admit its own students, with or without regard to accreditation by a member.

FRACHE is governed by a 26-member Council. Its membership is composed of three persons chosen by each member commission, six members of the general public, the president of the National Commission on Accrediting, and the Executive Director of the Federation.[2]

New bylaws for FRACHE, containing the elements quoted above, have been approved within the past 18 months by its member commissions. The new bylaws are generally interpreted as moving institutional accreditation into a national stance and away from its historical emphasis on regionalism.[3] The intent is for FRACHE, in addition to coordinating the activities of its member commissions, to develop national policies and procedures for institutional accreditation which can be regionally applied and administered.

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[2] For voting purposes and in the appointment of members to the Council of the Federation, the two commissions of the Western Association are treated as one. The six associations share equally in appointments and voting.

[3] Reports, National Commission on Accrediting, p. 4.

Encompassing all the traditional nonprofit and public institutions of higher education, including the nation's most prestigious colleges and universities, regional accreditation as granted by the member commissions of FRACHE represents the highest and most respected form of institutional accreditation in the United States. The regional associations have been, and continue to be, influential educational organizations.

FRACHE's role as a national body is limited, however. Its purview does not extend to specialized accreditation of programs of study nor does it encompass commissions which accredit special-purpose institutions such as the Accrediting Commission for Business Schools, the Accrediting Bureau for Medical Laboratory Schools, Accrediting Association of Bible Colleges, Cosmetology Accrediting Commission, National Home Study Council, National Association of Trade and Technical Schools, American Association of Theological Schools, the Commission on Occupational Educational Institutions of the Southern Association of Colleges and Schools, or the Commission on Occupational Education of the New England Association.

National Commission on Accrediting (NCA).--NCA was organized by institutions of higher education to control the proliferation of accrediting agencies and to coordinate and monitor professional and specialized accreditation in the United States. An independent association of colleges and universities and their institutional associations, the Commission seeks to accomplish its primary objectives of coordination and monitoring by "recognizing" agencies to accredit in specifically defined curriculum areas and degree levels. To be recognized, agencies must meet the NCA criteria and conduct their operations in conformity with the NCA Code of Good Practice in Accrediting.

The NCA governing board is composed of six representatives designated by each of the following institutional membership associations, termed "Constituent Members" in the Commission bylaws:[4] American Association of Community and Junior Colleges, American Association of State Colleges and Universities, Association of American Colleges, Association of American Universities, Association of Urban Universities, Association of Governing Boards of Universities and Colleges, and the National Association of State Universities and Land-Grant Colleges. In addition, the chairman of the Council of FRACHE is an ex officio and voting member, bringing the total Board membership to 43. The Association of Governing Boards appointees are trustees of institutions of higher education and are considered "public" members by NCA.

The NCA Bylaws detail its powers relative to member institutions and constituent associations:

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[4] National Commission on Accrediting, Bylaws, p. 4.

> Article III, Section 5. ...The Board of Commissioners is designated by consent of its members to speak and act for them with respect to policies and procedures of accrediting agencies whose operations directly affect the administration or programs of educational institutions.
>
> . . . .
>
> Article III, Section 6. The acts, rulings, and recommendations of the Board of Commissioners with respect to accrediting shall not be binding upon the individual Institutional Members, whose freedom of action and self-governance shall remain inviolate. Nevertheless, all Member Institutions accepting these Bylaws do obligate themselves to consult and inform the Commission before undertaking action contrary to the rulings and recommendations of the Board of Commissioners.[5]

NCA's power over accreditation is thus limited to the degree that it can persuade agencies to abide by its policies and by the willingness of institutions of higher education to "boycott" nonrecognized accrediting agencies. It has no authority to require agencies to submit to its policies and procedures. NCA's authority has never extended to the regional associations. It "relies"[6] on the regionals to grant institutional accreditation.[7] Because of its governance structure, the Commission has not encompassed within its recognition all agencies accrediting nonprofit and proprietary educational endeavors which are not part of a college or university. However, NCA has recognized agencies to accredit educational programs for professions offered by special-purpose institutions. Examples are the American Podiatry Association and the American Osteopathic Association. The latter, at the time of its recognition, accredited no osteopathic schools or colleges which were components of universities. All colleges of podiatry are independent institutions. On the other hand, the Commission has not recognized the Accrediting Commission for Business Schools (ACBS) which accredits institutions chartered by some states to award associate and baccalaureate degrees.[8]

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[5] Ibid., p. 5.

[6] Term used with regard to regional associations in the NCA recognized list of accrediting agencies.

[7] The executive committees of FRACHE and NCA agreed in October 1971, in principle to the merger of the two organizations to form one national nongovernmental body to coordinate, monitor, and supervise accreditation of postsecondary education. Subsequent negotiations have broadened the original agreement

The 1971 Nationally Recognized Accrediting Agencies and Associations list of the U. S. Commissioner of Education included nine agencies which did not appear on the 1971 NCA list, illustrating the less than comprehensive scope of the

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to include representation from specialized agencies which accredit programs of study in regionally accredited institutions and from other agencies currently holding recognition from the U. S. Commissioner of Education but not the NCA. In addition, current plans call for the appointment of six public representatives to the governing board of the new organization. As of November 1972, the provisions of the Articles of Association of the proposed organization were still being deliberated. Subsequent to the final draft, the Articles will have to be ratified by FRACHE, NCA, and presumably by the participating nationally recognized agencies.

[8] The NCA Board of Commissioners took action at its 1972 Annual Meeting to notify ACBS that (1) it would be willing to entertain an application for recognition, and (2) that it had no objection in principle to the fact that ACBS accredits proprietary schools.

National Commission in the accreditation of postsecondary education. These agencies include the Accrediting Bureau for Medical Laboratory Schools, American Association of Nurse Anesthetists, Accrediting Association of Bible Colleges, Accrediting Commission for Business Schools, Association for Clinical Pastoral Education, Cosmetology Accrediting Commission, National Home Study Council, National Association for Practical Nurse Education and Service, Inc., and the National Association of Trade and Technical Schools.

NCA is supported financially through dues paid by its member colleges and universities. The constituent associations of NCA do not contribute to its financial support.

The National Commission has from time to time supported or sponsored studies of accrediting and conducted seminars on accrediting problems. By virtue of its name and the fact that it is Washington based, NCA has also been looked to as the primary spokesman for nongovernmental accreditation.[9]

Office of the U. S. Commissioner of Education.--The United States Commissioner of Education is required by educational legislation to publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of education or training offered by educational institutions and their programs of study. The Commissioner's authority for being involved in accreditation flows from federal legislation which uses accreditation status granted by nongovernmental accrediting agencies as one means of establishing eligibility for participation in federally funded programs.[10]

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[9] "The Office of Education supports and encourages the National Commission on Accrediting in its role as a national coordinator and spokesman for voluntary accreditation." Statement contained in the 1971 edition of Nationally Recognized Accrediting Agencies and Associations, p. 3, and previous editions. The 1972 edition does not contain the statement.

Much like the National Commission on Accrediting, the U. S. Commissioner of Education's influence in accreditation stems from the "recognition" process through which accrediting agencies gain or are denied listing as a nationally recognized accrediting agency or association. To be listed, accrediting agencies must meet the Commissioner's criteria for a nationally recognized agency.[11] The recognition process is administered by the Accreditation and Institutional Eligibility Staff (AIES) with the guidance of an Advisory Committee.

The U. S. Commissioner of Education has no authority to require accrediting agencies to submit to his recognition process. The agencies must seek his recognition on their own initiative. As a practical matter, however, nearly all agencies which have acceptance and stature in postsecondary education have sought and achieved recognition by the Commissioner. They do so for two principal reasons: (1) their recognition by the Commissioner provides accredited institutions and students of accredited institutions with a direct, quick, and relatively sure route to eligibility to participate in federally funded programs, and (2) recognition by the Commissioner is a source of prestige and status. Sometimes only the latter reason is involved since not all the agencies on the U. S. Commissioner's list have a functional relationship to establishing eligibility for federal funds.

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[10] Accreditation was first used as a mechanism for establishing eligibility for federal funds in the Veterans Readjustment Act of 1952 (P.L. 550), 38 U.S.C. ss 1653 (a)). It has been utilized in educational legislation frequently since then.

[11] The criteria may be found in Nationally Recognized Accrediting Agencies and Associations, pp. 3, 4, and the Federal Register, January 16, 1969, p. 643.

The comprehensiveness of the Commissioner's list and other activities of the AIES staff give USOE a substantial influence in accrediting. The AIES staff also brings the influence of the Office of the Commissioner to bear through other activities which have an impact on accrediting agencies. It serves as an interpreter of USOE policy concerning accreditation and institutional eligibility; it publishes information about accreditation which may be of interest to the public; it maintains liaison activities with accrediting agencies and other interested groups, such as congressional committees; and it serves as an ombudsman for complaints received by USOE concerning the practices of accredited institutions.[12]

The 1971 recognized list of the U. S. Commissioner of Education included 42 agencies. It included all the agencies recognized by the National Commission on Accrediting with the exception of three: the Association of American Law Schools, the American Home Economics Association, and the American Society of Landscape Architects.[13]

Working Relationships and Division of Labor Among Accrediting Agencies.--Even though duplication of effort and lack of coordination among accrediting agencies is still a frequently heard complaint, there have been attempts at co-operative working efforts between accrediting agencies for several years. These have helped to move accreditation in the direction of becoming a system and away from being a series of uncoordinated parts.

The criteria of the National Commission on Accrediting require a specialized agency to limit "itself in accrediting to those professional areas with which it is directly concerned" and to rely "on the regional associations to evaluate the general qualities of institutions."[14] Furthermore, the NCA in recognizing accrediting agencies delimits responsibilities of specialized agencies by prescribing the curriculum area and/or degree levels at which the agency may accredit. Thus, some division of labor between the institutional and specialized agencies is achieved.

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[12] Ronald S. Pugsley, "Accreditation Policy Unit-USOE: Origins, Activities and Current Perspectives," presentation at 1971 Annual Convention of American Medical Technologists.

[13] The American Society of Landscape Architects has since been recognized by the Commissioner.

Many of the regional commissions and the specialized agencies engage in two practices which also have an impact on articulation of the two types of accreditation. The regional commissions and the specialized agencies will conduct joint visits to an institution if it so requests, comparing and exchanging information in the process. In cases where joint visits are not conducted, some specialized agencies encourage institutions to ask the appropriate regional commission to appoint a "generalist"[15] to accompany the specialized agency visiting team.[16]

The recognition procedures of the National Commission on Accrediting and the U. S. Commissioner of Education have served to limit but not eliminate jurisdictional disputes among accrediting agencies. Wherever such disagreements have occurred, they have generally been resolved between the accrediting agencies in a mutually acceptable manner. In general, the territory of one accrediting agency has tended to be respected by all other agencies.

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[14] National Commission on Accrediting, Criteria for Recognized Accrediting Organizations, para. 2c.

[15] Term most often used to describe a team member with an institution-wide orientation.

[16] Relationships among the regional associations and the specialized agencies are outlined in Procedures of Accrediting Education in the Professions.

However, there are exceptions to the above which create confusion for institutions and the public. Three agencies accredit programs of study in the medical laboratory field. Two agencies are recognized to accredit schools of law by the National Commission on Accrediting. The U. S. Commissioner of Education recognizes two agencies to accredit practical nursing education programs.

FRACHE has achieved considerable success in coordinating regional accreditation and in obtaining consistency in terminology and procedures. Regional accreditation still operates, however, with differing standards and many variances. Moreover, institutions still labor under duplicate requests for similar information by two or more accrediting agencies.

Additionally, some gaps still exist in the accreditation of postsecondary education. Nonaccess of a proprietary school to a recognized accrediting agency led to the Marjorie Webster Junior College v. Middle States Association of Colleges and Secondary Schools litigation, as was pointed out in

Chapter II. Organizations which are not chartered educational institutions are beginning to seek accreditation for their educational endeavors.

Sponsorship of Accreditation and Educator Involvement

The Delphi participants concluded that accreditation should be sponsored by voluntary associations of peer institutions unless there are valid and compelling reasons to the contrary, in which case educators should still be extensively involved in the accreditation activities.

Table 7 (pp. 166-172) presents the organizational elements of the recognized accrediting agencies. The table also details the extent of educator-practitioner and other involvement in the accreditation process.

Sponsorship.--The data show that 18 accrediting agencies are either directly sponsored by, or closely identified with, associations of peer institutions or component parts of peer institutions.[17] Twenty-one agencies are more closely identified with sponsorship by professional associations, and one is sponsored jointly by a professional association and an association of peer institutions. The membership of five agencies is so diverse that they can be said to be operating

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[17] The criterion used to make these categorizations was: did the agency or agencies selecting representatives for the policy- and decision-making board select a majority of the members?

TABLE 7. ORGANIZATIONAL ELEMENTS OF RECOGNIZED ACCREDITING AGENCIES

ACCREDITING AGENCY	SIZE OF ACCREDITING BODY	AGENCY SELECTING REPRESENTATIVES & NUMBER APPOINTED	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC OR OTHER MEMBERS	NOTES
Accrediting Assn. of Bible Clgs.	8	Accrediting Assn. of Bible Clgs. (8)	8	None	None	Plans are being formulated to add public or lay members.
Accrediting Bur. for Medical Lab. Schools	9	Accredited Schools (3) Amer. Med. Tech. (3) Selected by Accrediting Bur. (3)	4 (see notes)	3	1-Hosp. Adm. 1-Dept. head, Medical Sch.	Educators include 1 professor of chemistry & 1 M.D. pathologist. Practitioners include 1 D.O. pathologist.
Accrediting Comm. for Business Schools	13	Elected by Inst. (9) United Business Schools Assn. (4)	9	-	4-Businessmen or educators from public & nonprofit higher edu.	This will be the composition following a reorganizational transition period.
Accrediting Comm. for Graduate Programs in Hospital Admin.	7	Amer. Clg. of Hosp. Adm. (1) Amer. Hosp. Assn. (1) Amer. Pub. Health Assn. (1) Assn. of Univ. Programs in Hosp. Adm. (4)	4	2 (see notes)	1-Medical educator	At least two practitioners are always members of the Commission.
Amer. Assn. of Collegiate Schools of Business, Operations Committee & Accreditation Council	5	Amer. Assn. of Collegiate Sch. of Business (5)	4	(see notes)	1-Nonacademic representative (see notes)	1 Nonacademic member is required by bylaws; may be from government, foundations, associations, business, or industry.
Amer. Assn. of Nurse Anesthetists, Board of Trustees	9	Amer. Assn. of Nurse Anesthetists (9)	3 (see notes)	6	None	All educators are practitioners.
Amer. Assn. of Theological Schools, Comm. on Accrediting	9	Amer. Assn. of Theological Sch. (9)	8	1	None	Generalists from regional associations participate in some visits.
Amer. Bar Assn., Council of the Section of Legal Education & Admission to the Bar	18	Amer. Bar Assn. (18)	4	11	3-Members or past members of state bds. of bar examiners	Council recommends to ABA House of Delegates which takes final action on accredited status, procedures, & standards. Bylaws do not specify composition of Counc.
Amer. Chemical Society, Comm. on Professional Training	9	Amer. Chemical Society (9)	8	1	None	Composition of Committee not specified in ACS Bylaws.

ACCREDITING AGENCY	SIZE OF ACCREDITING BODY	AGENCY SELECTING REPRESENTATIVES & NUMBER APPOINTED	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC OR OTHER MEMBERS	NOTES
Amer. Council on Education for Journalism, Accrediting Comm.	23	Amer. Council on Edu. for Journalism (23)	9 (27 votes)	14 (26 votes)	None	ACEJ consists of 17 assn's. in the field of mass communications, all of which have voting representation on the Council.
Amer. Council on Pharmaceutical Education	10	Amer. Assn. of Clgs. of Pharm. (3) Amer. Council on Education (1) Amer. Pharm. Assn. (3) Nat'l. Assn. of Bds. of Pharm. (3)	3	3 (see notes)	1-ACE appointee is a clg. or univ. adm. 3-State licensure board members	Attempts are made to appoint persons with past or present affiliations with education, but not necessarily limited to pharmaceutical education.
Amer. Dental Assn., Council on Dental Education	9	Amer. Assn. of Dental Examiners (3) Amer. Assn. of Dental Schools (3) Amer. Dental Assn. (3)	3	3	3-Appointees of AADE are state licensure authorities	Committees of ADA submit recommendations on matters of policy & accredited status for dental auxiliary programs; their membership includes representatives of the dental auxiliary fields.
Amer. Home Economics Assn., Council for Professional Development	13 vot'g., 2 ex-officio without vote	Institutional members of AHEA (6) Amer. Home. Econ. Assn. (6) Amer. Dietetics Assn. (1)	10	3	None	Accreditation criteria & procedures must be ratified by institutional members.
Amer. Library Assn., Comm. on Accreditation	10	Amer. Library Assn. (10)	5 Reasonable balance is sought between educators & practitioners.	5	None	Council of ALA approves standards upon recommendation of the Committee on Accreditation & Executive Bd.
Amer. Medical Assn., Council on Medical Education	10	Amer. Medical Assn. (10)	Balance is sought between educators & practitioners.		None	The CME of AMA relies extensively on an advisory committee for allied health education. It has a diversified membership. It also collaborates with review committees composed of medical doctors & allied health professionals. The AMA House of Delegates approves standards. Interested parties may react to accreditation policy through AMA Reference Committee process.

ACCREDITING AGENCY	SIZE OF ACCREDITING BODY	AGENCY SELECTING REPRESENTATIVES & NUMBER APPOINTED	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC OR OTHER MEMBERS	NOTES
Amer. Optometric Assn., Council on Optometric Education	7	Amer. Optometric Assn. (3) Assn. of Schools & Clgs. of Optometry (see notes) (2) International Assn. of Boards of Examiners in Optometry (2)	2	3	2-Members of State Boards of Examiners in Optometry	ASCO & IAB nominate four members each; two are selected by AOA.
Amer. Osteopathic Assn., Bur. of Professional Education	10	Amer. Osteopathic Assn. (10)	4 1 who is both a practitioner and educator. (See note under Lay, Public & other Members)	5	NOTE: One of the educators is president of Nat'l. Bd. of Examiners for Osteopathic Physicians & Surgeons	Bur. of Professional Education accepts recommendations from the AOA Comm. on Clgs. AOA Bd. of Trustees takes final approval action. The accredited clgs. nominate 1 person for membership on the Bureau.
Amer. Podiatry Assn., Council on Podiatry Education	10	Amer. Assn. of Clgs. of Podiatric Medicine (see notes) (2) Amer. Podiatry Assn. (7) Federation of Podiatry Bds. (see notes) (1)	2	7	1-Federation of Podiatry State Bd. Examiners	The APA House of Delegates approves standards. AACPM & FPB nominate & House of Delegates elect CPR members. By-laws changes under consideration will add 1 student & 1 lay member to the Council.
Amer. Psychological Assn., Comm. on Accreditation (see notes)	7	Amer. Psychological Assn. (7)	(4) (Most educators also engage in professional practice)	(2)	None	COA actions are reviewed by the Education & Training Bd. & by the APA Bd. of Directors. APA will add lay or public member during 1973.
Amer. Public Health Assn., Exec. Board (see notes)	16	Amer. Public Health Assn. (16)	8	8 (Some practitioners teach part time)	None - Board also includes 2 ex-officio members who are public health educators	Council on Health Manpower reviews VT reports & makes recommendations. CHM presents recommendations to Exec. Bd. for final action. Accrediting organization & procedures of APHA are under revision.
Amer. Society of Landscape Architects, Board of Landscape Architectural Accreditation	15	Amer. Society of Landscape Architects (15)	10	5	None	Schools nominate educators; ASLA chapters nominate practitioners.
Amer. Speech & Hearing Assn., Amer. Boards of Examiners in Speech Pathology & Audiology (see notes)	9	Amer. Speech & Hearing Assn. (9)	5	3	1-Public Member, to be added March, 1973	The ABESPA delegates routine accrediting matters to Education & Training Bd.

ACCREDITING AGENCY	SIZE OF ACCREDITING BODY	AGENCY SELECTING REPRESENTATIVES & NUMBER APPOINTED	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC OR OTHER MEMBERS	NOTES
Amer. Veterinary Medical Assn., Council on Education	12	Amer. Veterinary Medical Assn. (12)	4	4	3-Employees of government agencies 1-Vet. Medical Researcher (see notes)	All Council members must be active members of AVMA. Accreditation policy & standards must be approved by AVMA House of Delegates.
Assn. of Amer. Law Schools, Exec. Comm.	6	Assn. of Amer. Law Schools (6)	6	None	None	The membership of the Assn. takes final action on all accrediting decisions upon recommendation of the Exec. Comm. which in turn bases its recommendations on actions of Comm. on Accreditation.
Assn. for Clinical Pastoral Education, Comm. on Certification and Accreditation	20	Regional Org. of Assn. for Clinical Pastoral Education (9) Assn. for Clinical Pastoral Edu., House of Delegates (see notes) (11)	18 All clinical pastoral educators are also practitioners		2-from Theological Schools	House of Delegates elects upon nominations by ACPE regional organizations. Hosp. administrators, social workers & related professions have served on the CCA.
Cosmetology Accrediting Comm.	17	Accredited Schools (9) Professional Assns. in Cosmetology (see notes) (4) Cosmetology Accrediting Comm. (4)	9	4	4-General educators associated with public educational insts.	Nominated by Professional Assns. Cosmetology; elected by accredited schools
Council on Social Work Education, Comm. on Accreditation	17	Council on Social Work Education (17)	11	3	2-Graduate students in Social Work 1-Univ. Administrator	
Engineers' Council for Professional Development, Engineering Education & Accreditation Comm. (see notes)	24	12 participating & 2 affiliated engr. societies share 20 appointments on the basis of number of curricula accredited in their respective fields. 4-at-large appointments are reserved for societies not having specific curricula involvement or the required minimum of accredited curricula.	21	2	1-National Council for Engr. Examiners, who is an engr. educator	Executive Comm. of ECPD takes final action on recommendations by EE&A. If Exec. Comm. vote is not unanimous, final action is taken by full Bd. of Directors. Participating engr. societies approve members that are elected to EE&A by ECPD Bd. of Directors after nomination by the Committee.

ACCREDITING AGENCY	SIZE OF ACCREDITING BODY	AGENCY SELECTING REPRESENTATIVES & NUMBER APPOINTED	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC OR OTHER MEMBERS	NOTES
Liaison Comm. on Medical Education	14	Assn. of Amer. Med. Clgs. (To represent perspective of med. education) (6) Council on Med. Education, Amer. Med. Assn. (To represent perspective of Med. practice) (6) Liaison Comm. (2)	AMA-AAMC Appointees currently distributed as follows: 1-Hosp. adm., 2-M.D. practitioners, 1-M.D. adm. of semi-public agency related to med. education, 1-prof. of clinical medicine, 1-prof. of basic bio-med science, 4-medical school deans, 1-med. school dean-univ. vice-pres., 1-univ. vice pres.		1-Public member 1-Federal Gov't. official	To meet statutory provisions for licensure in some states, Liaison Comm. actions must be ratified by CME of AMA and/or the AAMC.
Nat'l. Architectural Accrediting Board, Inc.	11	Amer. Inst. of Architects (2) Nat'l. Council of Architectural Registration Bds. (2) Assn. of Collegiate Schools of Arch. (3) Assn. of Student Chapters of AIA (1)	2	2	1-Generalist edu. 2-Related design professionals 1-Grad. student 1-Undergrad. stds. 2-State bd. members who are also practitioners	NAAB selects generalist & related design professionals. AIA, ACSA, NCARB & ASC/AIA make nominations. Undergrad. is nominated by ASC of AIA. ACSA nominates grad. student. President of AIA appoints from the list of nominees.
Nat'l. Assn. for Practical Nurse Edu. & Service Inc., Accrediting Review Board	7	Nat'l. Assn. for Practical Nurse Edu. & Service, Inc. (7)	6	None (see notes)	1-Generalist Educator (after April, 1973)	NAPNES' Edu. Committee sets accrediting policy & delegates the administration to the ARB; A practitioner is a member of the Education Committee.
Nat'l. Assn. of Schools of Art, Comm. on Accrediting	7	Nat'l. Assn. of Schools of Art (7)	7	None	1-Public Member to be added during 1972-1973	Actions of the Comm. ratified by the Assn. Bd. of Directors.
Nat'l. Assn. of Schools of Music						
Comm. on Undergrad. Studies	7	Nat'l. Assn. of Schools of Music (7)	7	None	None	Both commissions administer the accreditation process & recommend action to the NASM Bd. of Directors & the Assn. membership.
Comm. on Graduate Studies	7	Nat'l. Assn. of Schools of Music (7)	7	None	None	
Nat'l. Assn. of Trade & Technical Schools	9	Nat'l. Assn. of Trade & Technical Schools (9)	5	N/A	4-Generalist educators from outside private occupational schools	

ACCREDITING AGENCY	SIZE OF ACCREDITING BODY	AGENCY SELECTING REPRESENTATIVES & NUMBER APPOINTED	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC OR OTHER MEMBERS	NOTES
Nat'l. Council for the Accreditation of Teacher Education	22	Amer. Assn. of Clgs. for Teacher Edu. (10) Nat'l. Edu. Assn. (6) Nat'l. Learned Societies (see notes) (3) Council of Chief State Sch. Off's. (1) Nat'l. Assn. of State Directors of Teach. Edu. & Certif. (1) Nat'l. Sch. Bd. Assn. (1)	10(usually)	6	3-Generalist Educators 1-Chief State Sch. Officer 1-Sch. Bd. Member 1-State Director of Teacher Certif.	Nat'l. Learned Societies appoint members on a rotating basis.
Nat'l. Home Study Council, Accrediting Comm.	9	Nat'l. Home Study Council (9)	4	N/A	3-Generalist Educators 2-Businessmen	Bylaws require 5 commissioners be from outside the home study field from areas such as business, colleges, public schools, government or vocational educators.
Nat'l. League for Nursing						The NLN Bd. of Directors delegates responsibility for accreditation to the 4-councils. The Councils are autonomous with respect to establishing standards & accrediting procedures, & the appointment of Boards of Review which have final authority for decisions related to the accredited status of programs. NLN has approx. 10% non-nurse membership.
Council for Baccalaureate & Higher Deg. Programs	9	Nat'l. League for Nurs'g. (9)	9	None	None	
Council of Diploma Programs	7	Nat'l. League for Nurs'g. (7)	7	None	None	
Council of Assoc. Deg. Prog.	7	Nat'l. League for Nurs'g. (7)	7	None	None	
Council of Practical Nurs'g. Programs.	7	Nat'l. League for Nurs'g. (7)	7	None	None	
Society of Amer. Foresters, Comm. on Accreditation	7	Soc. of Amer. Foresters (7)	4	3	None	The SAF Council gives final approval to standards & accredited status of programs.

ACCREDITING AGENCY	SIZE OF TEAM	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED		LAY, PUBLIC, OR OTHER MEMBERS	
		REGIONAL ASSOCIATIONS				
Middle States Assn. of Clgs. & Secondary Schools, Comm. on Higher Education	17	Middle States Assn. of Clgs. & Secondary Sch. (17)	16	N/A	1-Secondary School Educator	2-lay observers participate without vote in the proceedings of the Commission.
New England Assn. of Schools Clgs. Comm.,on Institutions of Higher Education	14	New England Assn. of Schools & Clgs. (14)	14	N/A	None	Plans are being formulated to appoint 6-public members to the Exec. Comm. of the Assn.
North Central Assn. of Clgs. & Secondary Schools, Comm. on Institutions of Higher Education	68	North Central Assn. of Clgs. & Secondary Schools (68)	65	N/A	3-Secondary School Educators	Size of Comm. varies according to formula providing for geographic distribution & distribution by type of institution.
Northwest Assn. of Secondary & Higher Schools, Comm. on Higher Schools	23	Northwest Assn. Secondary & Higher Schools (23)	23	N/A	None	
Southern Assn. of Clgs. & Schools, Comm. on Colleges	54	Southern Assn. of Clgs. & Schools (54)	43	N/A	11-Superintendents of Elementary or Secondary School Systems	The Comm. recommends to the Clg. Delegate Assembly, which takes final action. The CDA is composed of 1-representative from each accredited institution.
Western Assn. of Schools & Clgs., Accrediting Comm. for Jr. Clgs.	12	Calif. Jr. Clg. Assn. (6) Pres. Univ. of Hawaii (1) WASC, Accrediting Comm. for Secondary Schools (1) WASC, Accrediting Comm. for Sr. Clgs. & Univ. (1) Bd. of Governors of Calif. Comm. Clgs. (1) Northwest Assn. of Secondary & Higher Schools, Comm. on Higher Schools (1) WASC (Member with trustee experience) (1)	8	N/A	1-Secondary Sch. Educator 1-Sr. Clg. Educator 1-Staff member from office of State Chancellor of Comm. Clgs. 1-Lay member	One public member will be appointed to the Comm. effective July 1, 1973.
Western Assn. of Schools & Clgs., Accrediting Comm. for Sr. Clgs. & Univ.	14	Western Clg. Assn. (12) WASC, Accrediting Comm. for Jr. Clgs. (1) WASC, Accrediting Comm. for Secondary Schools (1)	12	N/A	1-Secondary School Educator 1-Jr. Clg. Educator	

as independent agencies. The tendency is for multipurpose and special-purpose institutions to be accredited by an agency sponsored by an association of peer institutions with specialized agencies accrediting a specific program of study to be sponsored by professional associations.

Determining whether there are "valid and compelling" reasons why accreditation in a particular field is not sponsored by an association of peer institutions is beyond the practical scope of this study. To make such determinations, one would have to explore the alternatives to professional association sponsorship, delve into the history of the development of accreditation in each field, and look at the related activities of certification, licensure, and registration.

Educator Involvement.--There are two important measures of educator involvement in the accreditation process: (1) the number serving on the policy- and decision-making bodies, and (2) the number serving on teams which visit institutions and programs of study for evaluation purposes.

Of the 18 agencies sponsored by, or identified with, associations of peer institutions, 17 have all or a majority of educators from the field being accredited on their policy- and decision-making boards. Only one has a minority of educators from the field being accredited. Counting the three "generalist" educators on its board, it too would have a majority.

Of the remaining 27 agencies, 13 have a voting majority[18] of educators from the field being accredited, 10 have a minority, and four are evenly split between educators and other classes of membership.

Thirty-four of the 45 recognized agencies either structure their visiting teams with all or a majority of educators (including generalists and related professions); eight generally send teams with equally divided educator-practitioner membership, and three have no standard practice. In many cases, the composition of the visiting team is not a matter of fixed policy. Teams are usually tailored especially for the institution or program being visited.

Table 8 (pp. 175-178) details the general practices of accrediting agencies with regard to the composition of site visit teams.

Accreditation as Public Business

The impact on the public of the activities and decisions of accrediting agencies was recognized in several statements by the Delphi participants. First, they declared that the policies, procedures, and standards of accreditation should be fully disclosed and developed as public business in open meetings. This principle was also made applicable to the

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[18] Weighted voting gives a minority of educators control of the American Council on Education for Journalism.

TABLE 8. COMPOSITION OF SITE VISIT TEAMS OF RECOGNIZED ACCREDITING AGENCIES

ACCREDITING AGENCY	SIZE OF TEAM	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC, OR OTHER MEMBERS
Accrediting Assn. of Bible Clgs.	3 to 5	Usually all	None	Generalists from regionally accredited institutions sometimes accompany VT.
Accrediting Bur. for Medical Lab. Schools	3 to 4	1-Usually a Staff member	1	1-Generalist Educator; 1-Financial Specialist
Accrediting Comm. for Business Schools	Minimum of 2-Bus. Sch. 3-Jr. Clgs. 4-Sr. Clgs.	1-Bus. Sch. 2-Jr. Clgs. 2-Sr. Clgs.	None	1-Business school; 1-Jr. clg; 2-Sr. clg; usually faculty or administrators from regionally accredited institutions.
Accrediting Comm. for Graduate Education in Hospital Adm.	4	Always 2; Sometimes 3	1-Sometimes	1 Staff member
Amer. Assn. of Collegiate Schools of Business	2 to 5 3-Usually	2		1-Nonacademic participant. Generalist may accompany team at request of institution; staff members participate
Amer. Assn. of Nurse Anesthetists	1 or 2	1-Always	1-Usually	Generalist sometimes accompanies team.
Amer. Assn. of Theological Schools	2 to 8	Usually all	Sometimes use practitioners	Generalists from regionally accredited institutions sometimes accompany VT.
Amer. Bar. Assn.	2 to 4	1-Always	1-Always	Usually 1-legal librarian; sometimes 1 social scientist.
Amer. Chemical Society	1	Nearly always an educator 1	None	
Amer. Council on Education for Journalism	3 to 6	Always a majority of educators; always one practitioner.		Generalist at the request of institution.
Amer. Council on Pharmaceutical Education	2	1-Staff Member (a pharmaceutical educator) and 1-Council Member who may be either an educator or practitioner.		1-Member of State Board of Pharmacy participates as an observer. Generalist educator appointed by regionals sometimes participates.
Amer. Dental Assn.				1-University Finance Officer, Specialists as needed. State Board is invited to send a representative. 2-ADA staff members accompany team on dental school visits; 1-staff member may accompany team for dental auxiliary visit.
Dental Schools	5	3	1-Always	
Dental Auxiliary Programs	2	1-Dental Aux. Educator; 1 ADA Council Member		
Amer. Home Economics Assn.	4 to 5	3 or 4	1 or 2	AHEA Staff Member accompanies team.
Amer. Library Assn.	3 to 4	3-Usually	1-Always	None
Amer. Medical Assn.	2 to 4	Half of team is either a technologist-educator or technologist-practitioner		Usually 1 related Medical Specialist; usually 1 AMA Staff Member.
Amer. Optometric Assn.	4 to 7	1-Always 3-Sometimes	2	Usually 1-Examining Board Member; usually 1-Generalist Educator; 1 Staff Member.

ACCREDITING AGENCY	SIZE OF TEAM	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC, OR OTHER MEMBERS
Amer. Osteopathic Assn.[5]	12 to 14	7 to 8	4 to 5	1-Generalist Educator; 1-Staff Member.
Amer. Podiatry Assn.	5	1-Must be an educator	2-Usually are practitioners	1-Generalist Educator; 1-APA Staff Member.
Amer. Psychological Assn.	3 to 5	4	1	None
Amer. Public Health Assn.[2]	5	1 1 Member of Council on Health Manpower who may be either an educator or practitioner	1	1-Generalist Educator appointed by Regional Assn.; 1-APHA Staff Member.
Amer. Society for Landscape Architects	3	2	1	Generalist sometimes accompanies VT.
Amer. Speech & Hearing Assn.	2	2	None	Occasionally an observer of The Amer. Boards of Examiners in Speech Pathology and Audiology accompanies the team.
Amer. Veterinary Med. Assn.	5 to 7	Educator-practitioner balance is not a primary consideration. Two are selected from basic sciences, two from clinical sciences. Usually this results in two educators and two practitioners.		1-AVMA Staff Member; 1-Observer (frequently from Canadian Veterinary Medical Assn.); 1-Generalist (frequently).
Assn. of Amer. Law Schools	3 to 4	2-Usually	1-Usually	(Experimenting with including scholars outside the field of law).
Assn. for Clinical Pastoral Education	2 to 5 3-Usually	All (All educators are practitioners.)		None
Cosmetology Accrediting Comm.	3	1	1	1-Generalist Educator who serves as Chairman.
Council on Social Work Education, Comm. on Accreditation	3 to 4	All-Usually	1-Sometimes	Representatives of states sometimes accompany team as observers.
Engineers' Council for Professional Development	1-per curriculum plus 1	50%	50%	None
Liaison Comm. on Medical Education	2 to 6	Alway 1-educator and 1-practitioner. Other members may either be practitioners, medical educators, hospital administrators, or basic medical scientists.		1-Secretary of VT who either is AMA or AAMC staff member.
Nat'l. Architectural Accrediting Board, Inc.	4	1 [3]	1	1-State Registration Board Member; 1-Student; 1- Generalist if requested by institution.
Nat'l. Assn. for Practical Nurse Education & Service, Inc.	2	2	None	None

ACCREDITING AGENCY	SIZE OF TEAM	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC, OR OTHER MEMBERS
Nat'l. Assn. of Sch. of Art	2 to 3	All	None	None
Nat'l. Assn. of Sch. of Mus.,	1 to 2	All	None	None
Nat'l. Assn. of Trade & Tech. Schools	3 to 12	1-Minimum; others as needed	1-Minimum (or employer)	1-Commissioner or NATTS Staff Member. Consumer protection agencies and local or state education officials are invited to accompany VT.
Nat'l. Council for the Accreditation of Teacher Edu.	6 to 10 Add'l. persons for branch campuses	4-Minimum	2-Minimum	State Department representative is invited to accompany team. State Teachers Assn. may send observer if institution consents.
Nat'l. Home Study Council	4-Minimum	1-Minimum (VT Chairman and 1-business operations specialist, who may or may not be home study educators.)[4]	N/A	1-Accrediting Commission member or staff person
Nat'l. League for Nursing (All Councils)	2	2	None	None
Soc. of Amer. Foresters	4	1	1	1-SAF Staff Member; 1-Generalist Educator.

ACCREDITING AGENCY	SIZE OF TEAM	EDUCATORS FROM THE FIELD BEING ACCREDITED	PRACTITIONERS FROM THE FIELD BEING ACCREDITED	LAY, PUBLIC, OR OTHER MEMBERS
REGIONAL ASSOCIATIONS[6]				
Middle States Assn. of Clgs. & Secondary Schools	6 or more	All	N/A	Secondary School educators sometimes accompany VT.
New England Assn. of Schools & Clgs.	4 to 10	All	N/A	None
North Central Assn. of Clgs. & Secondary Schools	4 or more	All	N/A	Experimenting with laity & students as members of VT.
Northwest Assn. of Secondary & Higher Schools	6 to 16	All	N/A	None
Southern Assn. of Clgs. & Schools	5 or more; 9-Average	All	N/A	State-level education officials accompany teams in some instances.
Western Assn. of Schools & Clgs; Jr. Clg. Comm.	5 to 11	All (except as noted under "Lay, Public, or Other.")	N/A	1-Staff Member, Board of Governors of Calif. Jr. Clgs. Some Jr. Clg. Board Members are being used.
Western Assn. of Schools & Clgs, Sr. Clg. Comm.	3 to 10	All	N/A	None

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[1] ASC does not always send a visiting associate. Any decisions about the necessity or desirability of a visit as a part of an evaluation is made following an informal conference with the department chairman, or, in the case of re-evaluation of institutions already on the ACS approved list, after a careful study of the re-evaluation questionnaire data submitted by the department chairman.

[2] These are interim measures being tried by APHA during extensive revision of its accreditation organization and operation.

[3] NAAB usually sends a five-member team for initial accreditation visits and frequently sends one to three-member teams for interim visits when matters of concern arise.

[4] At least two subject matter specialists review materials for each course offered by a home study school with reports going to the Accrediting Commission. They do not necessarily accompany the team.

[5] AOA sends survey teams for re-evaluation each six years. Interim visits are frequently conducted each two or three years with a five or six member team.

[6] The regional associations and some specialized agencies, mainly at the request of the institution, conduct joint accreditation visits. In addition, state agencies send observers or participants to accompany the regional association visiting team.

national body to coordinate, monitor, and supervise nongovernmental accreditation.

Secondly, the Delphi participants determined that the national body to coordinate, monitor, and supervise accreditation should have one-third public members and that the accrediting agencies it recognizes should include lay members who are capable of contributing effectively to the accrediting enterprise and relating the activities of accrediting to the public interest.

On the other hand, the Delphi participants limited the public business aspect of accreditation by stating that decisions regarding the accredited status of institutions and programs of study should be made in executive session with the information under consideration kept confidential.

There are a number of practices and policies of accrediting agencies which can be used to measure the extent to which they consider their activities public business. Among these measures are the public availability of policies, standards, and accredited lists; the extent to which input is sought in the development of policies, procedures, and standards; the setting for decision-making on accredited status of institutions or programs of study; and the number of lay, public, or other members who serve on policy- and decision-making boards.

Public availability of policies, standards, and accredited lists.--In response to telephone interviews for this study, representatives of all recognized agencies said their policies, procedures, standards, and accredited lists are made available to any institution, agency, or individual upon request. Moreover, many of these same items, the respondents believed, are available at any reasonably comprehensive library.

Extent of input sought in the development of policies and standards.--Twenty-seven of the 45 recognized agencies indicated that they actively sought and provided a mechanism for input from external parties in the development of policies and accrediting standards.[19] Nine agencies said they did not seek external input for these purposes and nine others indicated they sought input only from the affected professions.

The procedures of 39 of the agencies would permit an external party to appear, on request, at a meeting of the agency to discuss or comment upon proposed changes or additions to policies or standards. Three said their policies would not permit such an appearance and three said they had no policy to cover such a request. Some agencies are conducting formal hearings before making changes in policies or standards.

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[19] External parties were defined as parties external to the membership of the accrediting agency to include non-accredited institutions or programs.

There appears to be a trend in this direction. Thirty-seven of the agencies indicated that they gave notice of impending changes in policies, procedures, and standards in the printed publications of the agency or in professional or scholarly journals.

These data are presented in Table 9 (pp. 182-183).

Decisions on accredited status.--Without exception, all accrediting agencies make decisions on the accredited status of institutions or programs of study in executive session with the information on which the decision is based being kept confidential between the accrediting agency and the institution. Public release of the information or the agency's report is at the option of the institution.

Lay or public membership on policy- and decision-making bodies.--In a preceding section of this chapter, it was shown that educators are extensively involved in policy- and decision-making in accreditation. Tables 7 and 8 (pp. 166-172; 175-178) include data relative to other categories of individuals who are involved in accreditation. The data show that either educators or practitioners constitute the overwhelming majority of the membership on policy- and decision-making bodies and visiting teams, thus satisfying the concern raised in the Delphi statements that the organization of accrediting agencies should reflect extensive use of professional judgment and

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TABLE 9. PROCEDURES FOLLOWED BY RECOGNIZED AGENCIES IN DEVELOPMENT OF STANDARDS AND MAJOR POLICIES

ACCREDITING AGENCY	INPUT SOUGHT FROM EXTERNAL PARTIES [1]	POLICY WOULD PERMIT EXTERNAL PARTY TO APPEAR AT AGENCY MEETING TO COMMENT	ACCREDITED INSTITUTION OR PROGRAM PRESENT [2]	NOTICE GIVEN THROUGH
Accrediting Assn. of Bible Clgs.	Yes	Yes	Written & oral comments	Direct mail; agency publications
Accrediting Bur. for Medical Lab. Schools	Yes	Yes	Written & oral comments	Direct mail
Accrediting Comm. for Business Schools	Yes	Yes	Written & oral comments	Direct mail; agency publications
Accrediting Comm. for Grad. Education in Hospital Adm.	No	Yes	Written & oral comments	Direct mail to accredited programs
Amer. Assn. of Collegiate Schools of Bus.	Yes	Yes	Written & oral comments	Distb. of Board Minutes; Direct mail; agency publications
Amer. Assn. of Nurse Anesthetists	Yes	Yes	Written & oral comments	Direct mail; agency publications
Amer. Assn. of Theological Schools	Yes	Yes	Written & oral comments	Direct mail; agency publications
Amer. Bar Assn.	Unapprv'd schools; otherwise not from outside profession	Yes	Written & oral comments	Direct mail; agency publications
Amer. Chemical Society	Yes	Yes	Written & oral comments	Agency publications
Amer. Council on Education for Journalism[3]	Not from outside the profession	No	Written & oral comments	Direct mail
Amer. Council on Pharmaceutical Education	Yes	Yes	Written & oral comments	Direct mail; agency and professional publications
Amer. Dental Assn.[4]	Yes	Yes	Written & oral comments	Direct mail; professional publications
Amer. Home Economics Assn.	Yes	Yes	Written comments	Direct mail; agency publications
Amer. Library Assn.	Yes	Yes	Written & oral comments	Direct mail; agency publications
Amer. Medical Assn.	Yes	Yes	Oral comments	Agency publications
Amer. Optometric Assn.	Not from outside the profession	Yes	Written comments	Direct mail
Amer. Osteopathic Assn.	Not from outside the profession	Yes	Written & oral comments	Direct mail; agency publications
Amer. Podiatry Assn.	Not from outside the profession	Yes	Written & oral comments	Direct mail
Amer. Psychological Assn.	Not from outside the profession	Yes	Written & oral comments	Direct mail; professional journals
Amer. Public Health Assn.	Yes	No Policy	Written & oral comments	Direct mail; agency publications
Amer. Society of Landscape Architects	Yes	Yes	Written & oral comments	Agency publications
Amer. Speech & Hearing Assn.	Yes	No Policy	Written comments	Direct mail; agency publications
Amer. Veterinary Medical Assn.	Not from outside the profession	Yes	Written & oral comments	Direct mail
Assn. of Amer. Law Schools	Yes	Yes	Written & oral comments	Direct mail; agency publications
Assn. for Clinical Pastoral Education	Yes	Yes	Written & oral comments	Direct mail; agency publications
Cosmetology Accrediting Comm.	Yes	Yes	Written comments	Direct mail; agency publications

ACCREDITING AGENCY	INPUT SOUGHT FROM EXTERNAL PARTIES [1]	POLICY WOULD PERMIT EXTERNAL PARTY TO APPEAR AT AGENCY MEETING TO COMMENT	ACCREDITED INSTITUTION OR PROGRAM PRESENT [2]	NOTICE GIVEN THROUGH
Council on Social Work Education	Yes	Yes	Written & oral comments	Direct mail; agency publications
Engineers' Council for Professional Development	Yes	Yes	No special provisions for institutional participation	Direct mail; agency publications & professional journals
Liaison Comm. on Medical Education	No	No Policy	Assn. of Amer. Medical Clgs. receives oral & written comments	AMA & AAMC professional journals & publications
Nat'l. Architectural Accrediting Board	Not from outside the profession or the membership of NAAB.	Yes	Written & oral comments	Direct mail; professional journals
Nat'l. Assn. for Practical Nurse Education & Service, Inc.	Yes	Yes	Written & oral comments	Direct mail; agency publications
Nat'l. Assn. of Schools of Art	No	Yes	Written & oral comments	Minutes of Board meeting circulated to member schools
Nat'l. Assn. of Schools of Music	Yes	Yes	Written & oral comments	Direct mail; professional journals
Nat'l. Assn. of Trade & Technical Schools	Yes	Yes	Written & oral comments	Direct mail; professional journals
Nat'l. Council for Accreditation of Teacher Education[5]	Yes	Yes	Written & oral comments	Direct mail; agency publications & professional journals
Nat'l. Home Study Council	No	No	Written & oral comments	Direct mail; agency publications
Nat'l. League for Nursing	Yes	Yes	Written & oral comments	Direct mail; agency publications
Society of Amer. Foresters	Not from outside the profession	Yes	Written comments	Agency publications
REGIONAL ASSOCIATIONS				
Middle States Assn. of Clgs. & Secondary Schools	No	Yes	Written & oral comments	Direct mail; agency publications
New England Assn. of Schools & Clgs.	No	Yes	Written & oral comments	Direct mail; agency publications
North Central Assn. of Clgs. & Secondary Schools	No	Yes	Written & oral comments	Direct mail; agency publications
Northwest Assn. of Secondary & Higher Schools	Yes	Yes	Written & oral comments	Direct mail; agency publications
Southern Assn. of Clgs. & Schools	No	Yes	Written & oral comments	Direct mail; agency publications
Western Assn. of Clgs. & Schools - Jr. Clg. Comm.	Yes	Yes	Written & oral comments	Direct mail; agency publications
Western Assn. of Clgs. & Schools - Sr. Comm.	No	No	Written & oral comments	Direct mail

[1] Parties external to the membership of the Accrediting Agency to include nonaccredited institutions or programs.

[2] In instances where oral comments are indicated, agency holds special meetings to discuss proposed changes.

[3] Most policies are adopted and then "announced."

[4] Many policies are adopted without prior notification.

[5] American Association of Colleges for Teacher Education has responsibility for development of standards for teacher education.

expertise. But few of the agencies meet the criterion of involving laity in the accreditation process.[20]

In attempting to classify members of accrediting agencies, it at once becomes apparent that category definitions rapidly break down or the classifications become so numerous that the categorization serves no useful purpose. Terms such as "lay" or "public" are difficult to define in a manner which is functional and applicable to all agencies. The most useful approach appears to be to look for diversity in the membership of the policy- and decision-making bodies.

Despite the fact that a great deal of ambiguity is involved, the following information and classifications are instructive with regard to the membership of these policy- and decision-making bodies. It at least shows there is diversity. Of the 45 recognized agencies:

> Eight have memberships comprised solely of educators from the field being accredited;
>
> Fifteen have memberships comprised solely of educators and practitioners from the field being accredited;
>
> Fourteen have memberships which include, in addition to educators and/or practitioners from the field, individuals from related professions or educational endeavors;
>
> Eight have memberships which include representatives of state certification, licensure, or registration boards;

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[20] Statement 16,(Table 3 p. 118).

Six have memberships which include individuals who can be considered lay or public members; and

Two have memberships which include students from the field being accredited.

Of the 664 members comprising the policy- and decision-making boards of the 45 recognized accrediting agencies, approximately 460 are educators from the field being accredited. Approximately 126 are practitioners from the field being accredited and 78, or about 12 percent, are not educators or practitioners from the field being accredited. The 78 members can be categorized as follows: 14 officials connected with state certification, licensure, or registration boards; 1 federal official; 1 state official; 4 students; 7 lay or public members, four of whom are from "business;" and 51 individuals are from related professions or areas of education. Administrators of agencies which had lay or public members were unanimous in their opinion that this category of membership was making important contributions to the accrediting process and was effective in keeping the agency aware of its public trust responsibility.

The above data are changing rapidly. Many of the agencies have indicated plans to add public or other types of members to their policy- and decision-making boards.

Due Process in Accreditation

The Delphi participants gave a high rating to the principle that agencies recognized by the national body should provide for implementation of due process guarantees for both rulemaking and the adjudicatory aspects of accreditation. Tables 9 and 10 (pp. 182-183; 188-191) present data having a bearing on due process afforded institutions and programs of study by the recognized accrediting agencies. The data are not intended to deal with the technical aspects of due process but are designed to show the extent of interaction and openness between the agency and an institution or program of study during the decision-making process in accreditation.

Development of standards and major policies.--All the recognized agencies indicated that they afforded notice to accredited programs and institutions when changes are being contemplated in existing standards or major policies. The initial notice usually includes a draft of the proposed changes. However, one agency indicated that most policies are adopted and then announced and another reported that many policies are adopted without prior notification to the institution.

Thirty-two agencies indicated that it is their usual practice to provide notice by two means, direct mail and articles in agency publications or professional journals. Eight provided notice only by direct mail and five only through articles in agency publications or professional journals.

Once notice is given that changes in standards or major policies are under consideration, all but one of the agencies afford the accredited institution or program an opportunity to present comments. Thirty-eight agencies provide institutions with the opportunity to present both written and oral comments; one agency provides opportunity only for oral comments and five only for written comments. Where opportunity for oral comment is provided, the agency holds special meetings to discuss the proposed changes.

Procedures available to nonaccredited programs and institutions to comment upon proposed changes in policies and standards are those generally described in a preceding section, "Extent of Input Sought in the Development of Policies and Standards."

Decision-making on accredited status.--The recognized accrediting agencies vary widely with regard to the procedures they follow in making the decision on the accredited status of an institution or program of study. As can be seen from the data presented in Table 10 (pp. 188-191) some agencies reveal little to the institution and permit only limited interaction on the part of the institution, providing no opportunity for institutional representatives to comment in writing on the findings or recommendations of the visiting team. Other

TABLE 10. INSTITUTIONAL OPPORTUNITY FOR INPUT IN DECISION-MAKING ON ACCREDITED STATUS

	INSTITUTIONAL OPPORTUNITY TO COMMENT IN WRITING ON ELEMENTS IN VISITING TEAM REPORT BEFORE DECISION IS REACHED					
ACCREDITING AGENCY	PROVIDED WITH COPY	FACTUAL ASPECTS	RECOMMENDATIONS FOR IMPROVEMENT	VISITING TEAMS RECOMMENDATIONS ON ACCREDITED STATUS	APPEARANCE OF REP. AT AGENCY MEETING CONSIDERING VT REPORT	AGENCY HAS STATED APPEALS PROCEDURE
Accrediting Assn. of Bible Clgs.	Yes	Yes	Yes	Not included in VT Rpt. Inst. is consulted before negative decision is made	Upon request	Yes
Accrediting Bur. of Medical Lab. Schools	Yes	Yes	Yes	None made by VT	Upon request	Yes
Accrediting Comm. for Business Schools	Yes	Yes	VT Report does not include recommendations	None made by VT	Invited only if serious negative action is anticipated	Yes
Accrediting Comm. on Grad. Education for Hosp. Adm.	Yes	Yes	VT Report does not include recommendations	Report does not include VT recommendation	Upon request	Under Development
Amer. Assn. of Collegiate Schools of Business	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear	Yes
Amer. Assn. of Nurse Anesthetists	Yes	Yes	Yes	Yes	Upon request	Yes
Amer. Assn. of Theological Schools	Yes	Yes	Yes	Report does not include VT recommendation	None	Yes
Amer. Bar. Assn.	Yes	Yes	Yes	Yes	[5]	Yes
Amer. Chemical Society	No	[1]			None	Yes
Amer. Council on Edu. for Journalism	No	Report read to institution at time of exit interview (Policy being revised)			None	Yes
Amer. Council on Pharmaceutical Education	Yes	Yes	Yes	Report does not include VT recommendation	Upon request	Yes
Amer. Dental Assn.	Yes	Yes	Yes	Report does not include VT recommendation	Upon request	Yes
Amer. Home Economics Assn.	Yes	Yes	Yes	Report does not include VT recommendation	Upon request	Yes
Amer. Library Assn.	Yes	Yes	Yes; Eff.1/73	Report does not include VT recommendation	None	Yes
Amer. Medical Assn.	Yes	Yes	Yes	Report does not include VT recommendation	Upon request	Yes

INSTITUTIONAL OPPORTUNITY TO COMMENT IN WRITING ON ELEMENTS IN VISITING TEAM REPORT BEFORE DECISION IS REACHED

ACCREDITING AGENCY	PROVIDED WITH COPY	FACTUAL ASPECTS	RECOMMENDATIONS FOR IMPROVEMENT	VISITING TEAMS RECOMMENDATIONS ON ACCREDITED STATUS	APPEARANCE OF REP. AT AGENCY MEETING CONSIDERING VT REPORT	AGENCY HAS STATED APPEALS PROCEDURE
Amer. Optometric Assn.	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear	Yes
Amer. Osteopathic Assn.	Yes	Yes	Yes	Yes	Invited to appear	Yes
Amer. Podiatry Assn.	Yes	Yes	Yes	Yes	Invited to appear	Yes
Amer. Psychological Assn.	Yes	Yes	Yes	Report does not include VT recommendation	Upon request	Yes
Amer. Public Health Assn.	Yes	Yes	Yes	Yes	Invited to appear before Council on Health Manpower	Under development
Amer. Soc. of Landscape Architects	Yes	Yes	VT Report does not include recommendation	Report does not include VT recommendation	Upon request	Yes
Amer. Speech & Hearing Assn.	Yes	Yes	Yes	Report does not include VT recommendation	No policy	Yes
Amer. Veterinary Med. Assn.	Yes	Yes	Yes	Report does not include VT recommendation	No policy	Yes
Assn. of Amer. Law Schools[2]	Yes	Yes	VT frequently does not make recommendations	VT frequently does not make recommendations	Upon request	Yes
Assn. for Clinical Pastoral Education	No	Report discussed with institution at time of exit interview			None	Yes
Cosmetology Accrediting Comm.	Yes	Yes	Yes	None made by VT	Upon request	Yes
Council on Social Work Education	Yes	Yes	Yes	None made by VT	None	Yes
Engineers' Council for Professional Development	No	Presented orally at time of exit interview		VT does not reveal recommendation in exit interview	None	Yes
Liaison Comm. on Med. Edu.	Yes	Yes	Yes	Yes	None	Yes[6]
Nat'l. Architectural Accrediting Board	Yes [4]	Yes	Yes	Yes	Invited to appear	Yes

INSTITUTIONAL OPPORTUNITY TO COMMENT IN WRITING ON ELEMENTS IN VISITING TEAM REPORT BEFORE DECISION IS REACHED

ACCREDITING AGENCY	PROVIDED WITH COPY	FACTUAL ASPECTS	RECOMMENDATIONS FOR IMPROVEMENT	VISITING TEAMS RECOMMENDATIONS ON ACCREDITED STATUS	APPEARANCE OF REP. AT AGENCY MEETING CONSIDERING VT REPORT	AGENCY HAS STATED APPEALS PROCEDURE
Nat'l. Assn. for Practical Nurse Education & Service, Inc.	Yes	Yes	VT report does not include recommendation	VT makes no recommendation	No policy	Yes
Nat'l. Assn. of Schools of Art	Yes	Yes	Yes	Report does not include VT recommendation	None	Yes
Nat'l. Assn. of Schools of Music	No	[3]			Upon request	Yes
Nat'l. Assn. of Trade & Technical Schools	Yes	Yes	Yes	VT is not asked to make recommendation	Upon request	Yes
Nat'l. Council for Accreditation of Teacher Education	Yes	Yes	VT ordinarily makes no recommendations	VT makes no recommendations	Invited to appear	Yes
Nat'l. Home Study Counc.	Yes	Yes	Yes	Vt makes no recommendation	Upon request	Yes
Nat'l. League for Nursing (All councils)	Yes	Yes	Yes	VT makes no recommendation	Upon request	Yes
Soc. of Amer. Foresters	Yes	Yes	Yes	VT makes no recommendation	Upon request	Yes

INSTITUTIONAL OPPORTUNITY TO COMMENT IN WRITING ON ELEMENTS IN VISITING TEAM REPORT BEFORE DECISION IS REACHED

ACCREDITING AGENCY	PROVIDED WITH COPY	FACTUAL ASPECTS	RECOMMENDATIONS FOR IMPROVEMENT	VISITING TEAMS RECOMMENDATIONS ON ACCREDITED STATUS	APPEARANCE OF REP. AT AGENCY MEETING CONSIDERING VT REPORT	AGENCY HAS STATED APPEALS PROCEDURE
			REGIONAL ASSOCIATIONS			
Middle States Assn. of Clgs. & Secondary Sch.	Yes	Yes	Yes	Report does not include VT recommendation	None	Yes
New England Assn. of Schools & Clgs.	Yes	Yes	Yes	Report does not include VT recommendation	None	Yes
North Central Assn. of Clgs. & Secondary Sch.	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear	Yes
Northwest Assn. of Secondary & Higher Sch.	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear	Yes
Southern Assn. of Clgs. & Schools	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear on initial accreditation; invited on reevaluations only when negative decision is likely	Yes
Western Assn. of Schools & Clgs., Jr. Clg. Comm.	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear or respond in writing	Yes
Western Assn. of Schools & Clgs., Sr. Comm.	Yes	Yes	Yes	Report does not include VT recommendation	Invited to appear or respond in writing	Yes

[1] Both the president of the institution and the department chairman are notified of the conclusions of the Committee on Professional Training of ASC. In cases of approval, the institution is advised accordingly. The letter of notification may include suggestions for further improvement of the program. If approval is deferred or not recommended, the institution is advised of the reasons and is invited to keep the CPT advised of improvements and progress in eliminating program weaknesses.

[2] AALS has a detailed set of hearing procedures which the Association follows on academic freedom and tenure issues which have a major impact on the accredited status of a law school.

[3] The appropriate NASM Commission receives the visiting team report without comment from the institution. Affirmative recommendations are then acted upon by the NASM Board of Directors and the institution is notified. If the Commission does not forward an affirmative recommendation, the case is tabled until the institution can make improvements, present additional information, or respond to the Commission report. The Commission then forwards an affirmative or negative recommendation to the Board of Directors.

[4] The VT report initially goes directly to the NAAB, which considers the report and renders a tentative decision. The institution is then forwarded a copy, which includes notification of the tentative decision, and is afforded an opportunity to (1) comment on the report, and (2) send a representative to appear before the NAAB at its next meeting, at which time a final decision is rendered.

[5] A Committee on Accreditation reviews the VT report and frames a recommendation to the Council. If there are serious problems which require corrections, or if a negative decision appears warranted, an institutional representative will be invited to appear before the Council.

[6] Appeal is to AMA Council on Medical Education and/or the AAMC.

agencies reveal and invite comment only on part of the visiting team findings and recommendations. Still others are completely open with the institution, providing it with the opportunity to comment on the visiting team's recommendations for improvement and the accredited status of the institution or program of study. In the latter cases, the institution is invited also to have a representative present to offer oral comments when the agency meets to consider the visiting team report.

Forty of the 45 recognized agencies provide the institution with the opportunity to present written comments on the factual aspects of the visiting team's report. Thirty-four of the 40 disclose and invite comment as well on the visiting team's recommendations or suggestions for improvement. Seven of the 40 go a step further, revealing and inviting comment on the visiting team's recommendation regarding the accredited status of the institution or program of study. Twenty-three other agencies, whose visiting teams routinely make recommendations regarding accredited status, do not reveal them to the institution or invite comment.

The agencies also vary considerably with regard to policies permitting institutional representatives to appear at the meeting at which the agency is considering the visiting team report. Nine agencies routinely invite an institutional representative to appear at such meetings. Eleven permit no such appearances. Seventeen permit such appearances when so requested by the institution. Three have no policy to cover such appearances. Two agencies invite a representative to appear only when a negative decision is anticipated. Two agencies either invite a representative to appear or to present additional written comments. One agency invites a representative to appear on initial accreditation decisions; on decisions relating to reaffirmation of accreditation, the institution is invited to send a representative only when a negative decision is anticipated.

Other variances can be noted in the procedures of the recognized agencies. One agency solicits comments from the institution only after a tentative negative decision has been reached. Another agency considers the visiting team report and notifies the institution of its tentative decision. The institution is then afforded an opportunity to comment on the report and to send a representative to appear before the agency at its next meeting, at which time a final decision is reached.

Appeals procedures.--Forty-three agencies reported that they have formally stated procedures under which institutions or programs of study may appeal accrediting decisions. The other two agencies reported that they are in the process of developing formal appeals procedures.

The study made no attempt to investigate the sufficiency of the appeals procedures stated by the accrediting agencies with regard to procedural rights or the objectivity and independence of the decision-making body.

Types of Accreditation

The organization of accreditation has developed in such a manner as to provide for two types of accreditation, institutional and specialized. As previously noted, many institutions hold accreditation by both institutional and specialized accrediting agencies. It is generally believed that, for some fields, specialized accreditation is needed to provide a more extensive validation of the educational program than can be provided by institutional accreditation. It is also recognized that there must be limits on the number of specialized agencies which are permitted to accredit programs of study. Otherwise, unwarranted and virtually unlimited restrictions that serve no useful social purpose would be placed on educational institutions.

The Delphi participants determined that specialized accreditation should be conducted for educational programs preparing practitioners whose activities have a direct bearing on the health and safety of the public or whose activities could cause irreparable harm to individuals or to society. In other cases, institutional accreditation should be adequate to serve the public interest.

As noted in the review of literature, many commentators question the social need for all the currently recognized specialized agencies. It is doubtful whether all of them could meet this criterion established by the Delphi participants. Determining whether the activities of the agencies are necessary to protect the health and safety of the public or to protect individuals and society from irreparable harm is beyond the practical limitations of this study. The matter does deserve serious study, however.

CHAPTER VI

SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS

In the absence of effective chartering and monitoring of educational institutions and their programs of study by state or federal governments, nongovernmental accreditation became established in this century as the primary means of identifying quality in postsecondary education. By 1971, 45 nongovernmental agencies or associations were recognized by either the National Commission on Accrediting or the U. S. Commissioner of Education to accredit institutions or programs of study at the postsecondary level.

Nongovernmental accrediting agencies have three common characteristics. They tend to be sponsored or jointly sponsored by associations of peer institutions or professional associations. The members of their policy- and decision-making bodies come primarily from the field or type of institution being accredited. Although subject to limited external monitoring, they are accountable mainly to their sponsoring constituencies.

These agencies confer the highest formal recognition available to both private and public institutions in the United States. Consequently, they assume a broad role in society. The status they grant affects the choices of institutions and programs of study by prospective students and it affects the student's professional and occupational opportunities after graduation. The impact of these agencies is no less significant upon educational institutions. Accredited status is an important factor in the funding available to institutions and the standards and policies of accrediting agencies are major factors to be considered in the administration and operation of educational institutions and their programs of study. Perhaps the greatest single indication of the broad social role of nongovernmental accrediting agencies is the extensive reliance on them by state and federal governments. But, concurrent with serving functions which are of broad social interest, accrediting agencies also serve the more narrow and limited interests of the professions and the institutions which support them.

As a result, accrediting agencies occupy an awkward position in society: they serve both private and public interests yet they are neither private nor governmental. Some have called them independent, a nondescript term in view of their social functions. Others have termed them quasi-governmental. Perhaps the most instructive and helpful course of action is to view them as public agencies without direct accountability to the electorate or government. Although such a position is obviously susceptible to abuse, there are those who argue convincingly that society is best served when accreditation is afforded this vantage point. The reasons given are two-fold.

First, the evaluation of educational institutions and their programs is an art, not a science, and is therefore heavily dependent upon the expertise and subjective judgments of professionals. Professional associations and associations of peer institutions provide the critical mass of these resources. Secondly, the primary means of educational standard setting and evaluation should be kept insulated from the political arena. An activity so critical to the well being of education must not be potentially subject to the rise and fall of political passions or objectives. Moreover, the federal government has no authority to conduct accreditation for general purposes; reliance on the 50 states would result in great variances and virtual chaos in education.

Yet, nongovernmental accrediting agencies are under attack. The literature reveals that they are suspected and accused of using their position in society in ways which are not in accord with the greater public good. In short, they are often accused of exercising public responsibility for private gain.

Such charges are difficult, if not impossible, to document because of the inexactness of educational measurement and the dependence upon professional subjective judgment. Nonetheless, the criticism continues and in such volume as to affect the public's confidence in nongovernmental accreditation. Unless some corrective measures are taken, accreditation could lose its nongovernmental character or come under some form of government control.

Accepting the premise that nongovernmental accreditation is preferable to governmental accrediting, this study sought to identify changes which need to be made in the organization of nongovernmental accreditation in order that it can continue to be a socially useful enterprise.

The strategy used was (1) to systematically collect a body of thought from a group of individuals who were believed to be knowledgeable about accreditation, its functions, limitations, organization, strengths, weaknesses, and traditional role in American society, and (2) to use this body of thought as criteria to evaluate the current functions and organization of nongovernmental accreditation. Through the use of the Delphi procedure, approximately 100 persons interacted to establish a list of functions which nongovernmental accreditation should serve or seek to serve and a statement of principles which should characterize its organization.

Delphi Findings

The Delphi findings are summarized as follows:

Functions of Accreditation

Nongovernmental accreditation does and should serve a variety of functions in society, some of which are more essential than others. In no case should accreditation serve a function which conflicts with the public interest. Some functions are sufficiently important to warrant conducting accreditation solely for those purposes. Others are highly important to society and the smooth functioning of institutions. Still others are desirable by-products of accreditation which should be encouraged.

In the dynamic society, the relative importance of the functions of accreditation undergoes steady change with new ones being added and others shifting in their hierarchial relationships to meet new social and educational uses and needs. The emphasis on the various functions of accreditation appropriately varies among the types of accrediting agencies and the institutions and programs of study they serve. Functions of accreditation are of two basic types: (1) those oriented toward society at large, or public functions, and (2) those oriented toward institutions and programs of study, or educational functions.

Public Functions.--The broad functions which accreditation should serve or seek to serve and the order of their importance, at this period in time, are as follows:

Primary

To identify for public purposes educational institutions and programs of study which meet established standards of educational quality.

Secondary

To provide reasonable assurance that practitioners whose activities have a direct bearing on the public health and safety or whose activities could cause irreparable harm to society meet minimum educational standards upon entry into the profession.

To identify for public purposes educational institutions and programs of study which adhere to accepted ethical standards in business relationships with students.

To identify for public purposes educational institutions and programs of study which are making efficient use of their resources in meeting their stated goals and objectives.

Desirable By-Product

To provide on a comparative basis information to the public about accredited instiutions and programs of study.

Educational Functions.--Educational functions which accreditation should serve or seek to serve for institutions and programs of study, at this period in time, are as follows:

Primary

To stimulate improvement in educational standards and in educational institutions and programs of study by involving faculty and staff in required self-evaluation, research, and planning.

Secondary

To assist in the development of processes and instruments to evaluate institutions and programs of study and their educational achievements.

> To provide assurances regarding curricula, policies, practices, and requirements which enhance acceptance and cooperation and facilitate transfer of credit among a variety of types and levels of institutions.
>
> To protect institutions and programs of study against external and internal interference by groups and individuals who seek to control, distort, or divert the educational function to serve partisan interests or purposes.

Desirable By-Products

> To serve as a medium of communication for educational practices and ideas among institutions, individuals, and programs of study through widespread participation in the accreditation process.
>
> To assist institutions and programs of study in obtaining the resources needed to offer quality education by providing independent professional judgments.

Inappropriate Functions.--Accreditation should not be conducted for the purposes of stimulating understanding and acceptance of a discipline, to further its cause, to maintain a professional identity, to enforce social policy as established by federal legislation, or to increase educational and employment opportunities in institutions for minorities and for females.

Organizational Principles

Accreditation of postsecondary education should be embraced in a national system, utilizing national standards and procedures. It should be coordinated, monitored, and supervised by an independent national body with membership from institutions, institutional and specialized accrediting agencies, professional groups, and the public. The latter category should comprise about one-third of the membership. The national body should derive its authority from acting in the public interest and enforce its decisions through the weight of public sanctions. It should recognize accrediting agencies to grant institutional and specialized accreditation. All types of postsecondary accrediting agencies, without regard to types and levels of institutions they serve, should be considered for recognition. The recognized agencies should reflect a willingness to abide by policies and procedures established by the national body. It should provide leadership for nongovernmental accreditation through sponsorship and conduct of studies, seminars, and other activities designed to enhance the ability of nongovernmental accreditation to serve the public interest. It should finance its operations by means of a surcharge on the accrediting fees and/or budgets of the agencies it recognizes.

Accreditation should be conducted generally as public business. The policies, procedures, and standards of accreditation should be fully disclosed and developed in open meetings. The national body should develop its policies, procedures, and criteria for recognition in open forum, providing for input and discussion by accrediting agencies and interested members of the public. However, decisions on the accredited status of institutions and programs of study should be made in executive session with the information under consideration kept confidential.

Accrediting agencies should provide for implementation of due process guarantees for both rulemaking and the adjudicatory aspects of accreditation.

Unless there are valid and compelling reasons to the contrary, accreditation should be sponsored by associations of peer institutions. Regardless of sponsorship, however, educators should be extensively involved. The organization of accrediting agencies should reflect extensive use of professional judgment and expertise. It should also include laity or public members who are capable of contributing effectively to the accrediting enterprise and relating it to the public interest.

There should be two types of accreditation, institutional and specialized. Institutional accreditation should certify the overall quality and integrity of an institution. It should be adequate to serve the public interest except for programs preparing practitioners whose activities have a direct bearing on the public health and safety or whose activities could cause irreparable harm to individuals or to society.

Conclusions

Using the Delphi statements as criteria, the following conclusions were reached as a result of this study:

1. The functions or purposes the recognized agencies officially state for accrediting are generally within the bounds of appropriateness. However, a few agencies list functions or purposes which are too narrow, too self-serving, and which possibly conflict with the public interest.

2. Nongovernmental accreditation has evolved working relationships which gives it some attributes of a national system. It falls short of being the national system envisioned by the Delphi participants, principally because it lacks a national agency with authority to coordinate, monitor, and supervise all accreditation of postsecondary education and because not all institutions and programs of study are evaluated by national standards.

3. The organization, policies, and practices of many of the recognized accrediting agencies indicate that they are increasingly viewing accreditation as public business. However, nearly all the agencies need to make changes which reflect a greater awareness of their public responsibilities to take a more open approach to policy-making and standard-setting and to include public members on policy- and decision-making bodies.

4. Accrediting agencies are becoming more conscious of

the need to provide due process guarantees in both the rule-making and the adjudicatory aspects of accreditation. All but a few of the agencies are following procedures in the development and adoption of standards and major policies which manifest considerable interaction and openness between the agency and the accredited institutions or programs of study. This spirit of interaction and openness is less evident, however, with regard to decision-making on the accredited status of institutions and programs of study.

5. Multipurpose and special-purpose institutions tend to be accredited by an agency sponsored by an association of peer institutions which appear to have banded together primarily to accomplish educational objectives. Agencies accrediting a specific program of study tend to be sponsored by professional associations which appear to have banded together primarily to accomplish professional objectives. This is especially true for programs preparing practitioners where credentialling such as licensure, certification, or registration are required for practice.

6. Accrediting agencies are placing primary reliance on professional expertise and subjective judgment if these factors are equated with educator and practitioner membership on the decision- and policy-making bodies and visiting teams. A significant number of related professionals, which bring

another type of professional expertise, are active participants.

Limitations of Study

Because of practical limitations, this study was unable to evaluate adequately the organization of nongovernmental accreditation with respect to three points contained in the Delphi statements. These include determining whether:

1. Agencies have unstated purposes or reasons for conducting accreditation,

2. There are compelling reasons why many accrediting agencies are not sponsored by associations of peer institutions, and

3. Specialized accreditation in the various fields is needed to assure the adequate educational preparation of practitioners whose activities have a direct bearing on the public health and safety or whose activities could cause irreparable harm to individuals or society.

Recommendations and Observations

The survival of nongovernmental accreditation as the primary means of standard setting and evaluation of postsecondary education ultimately will depend upon whether it continues to be perceived as operating in the best interests of society. A review of the current status of nongovernmental accreditation suggests strongly that measures need to be taken which will assure society that the trust it has in accreditation is not misplaced.

Yet, the measures which can be taken are limited because the state of the art of educational measurement is such that accreditation must rely extensively on professional expertise and subjective judgment. In the minds of many, this sets up an inherent dilemma in which the interests of society are likely to suffer. Thus, the credibility of nongovernmental accreditation is likely to be a continuing problem.

However, there appear to be steps which nongovernmental accreditation can take to ameliorate this dilemma and to broaden its social, if not its educational, perspective. The following recommendations growing out of the Delphi statements and rationales are intended to permit nongovernmental accreditation to continue its critical reliance on professional expertise and subjective judgment, to ward off any necessity for government regulation, and to provide assurances to society that the process will operate in its best interest.

1. Accrediting agencies should more clearly, specifically, and forthrightly state their purposes for accrediting.

Ironically, many accrediting agencies which require institutions and programs of study to clearly state their educational objectives do not hold themselves to the same standard. The purposes or objectives of accrediting agencies in many cases are not clearly stated, if stated at all. Not only is such a clear statement needed for the guidance of the agencies, it is also needed to assess the social worth of the accrediting agencies.

The national body to coordinate, monitor, and supervise accreditation should require such statements and should approve only those purposes or functions which fall within the prescribed bounds of appropriateness for accrediting.

2. Institutions and accrediting agencies should move deliberately, but swiftly, to establish a national body to coordinate, monitor, and supervise accreditation of postsecondary education.

The role of the national body is critical in preserving the nongovernmental character of accreditation and in assuring its credibility with the general public and federal and state governments. The national body's organization and operations must set the tone for the agencies it recognizes to conduct institutional and specialized accreditation.

The organization of the national body should clearly subordinate the interests of the accrediting agencies, institutions, and the professions to those of the general public. Consequently, none of these groups should have voting control in the national body. Unwillingness on the part of accrediting agencies, institutions, and the professions to cooperate with the national body in establishing and maintaining policies and practices which are in the best interests of the public will pose a continuing threat to nongovernmental accreditation.

In the absence of an effective national body and a cooperative attitude among the accrediting agencies, the function of coordinating, monitoring, and supervising accreditation is likely to increasingly become a responsibility of agencies of federal government. Government studies, or those closely identified with government, have already implied in their conclusions the need for a federal role in the regulation of accrediting agencies. An effective national nongovernmental body with responsibility for coordinating, monitoring, and supervising accreditation would obviate such a need.

3. Nongovernmental accreditation should engage in two practices to enhance its credibility: (1) make increasing use of independently appointed public representatives, and (2) utilize a public hearing approach to the development of major policies and standards.

Public Representatives.--Participation of public representatives in the policy- and decision-making activities of accrediting agencies will do a great deal to enhance the credibility of nongovernmental accreditation and to keep it more aware of its social responsibilities. The credibility aspect would be enhanced a great deal more if the public representatives were independently appointed. The practice of agencies selecting their own representatives is likely soon to draw the fire of accreditation's critics. If this occurs, the agencies would be hard pressed to counter charges of nominalism.

The national body could appoint public representatives to serve on the policy- and decision-making bodies of its recognized agencies. It could do so in consultation with the agencies so as to avoid appointment of representatives which are unacceptable, much in the same manner institutions are currently allowed to reject, within limits, the appointment of unacceptable individuals of visiting teams.

The national body should set the example by arranging for independent appointment of its public members by agencies or organizations such as the Education Commission of the States and the Association of Governing Boards of Universities and Colleges.

Public hearings to develop major policies and standards.--The credibility of accreditation could be enhanced and its perspectives broadened if agencies provided for a more public approach to the development of major policies and procedures. The American Association of Colleges of Teacher Education, which has responsibility for the development of standards for the National Council for the Accreditation of Teacher

Education, and the American Council on Pharmaceutical Education have followed procedures which are worthy of emulation. Both agencies have conducted public-type hearings, preceded by wide notice, in developing new standards.

It is suggested that agencies (1) provide wide notice that policies and standards are being developed or modified, to include drafts of the proposed policies or standards. At a minimum, this should include publication in the appropriate professional or agency journals or newsletters and more widely read periodicals of general distribution such as the Chronicle of Higher Education, (2) provide opportunity for interested parties to make written comments, and (3) schedule one or more public hearings where interested parties can publicly state their concerns and ask questions.

Such an approach to development of major policies and standards should accomplish two things: (1) there would be less concern with potential abuse by professionals who must apply and administer policies and standards for accreditation, and (2) it would provide a forum for resolution of differences between those who are responsible for the administration of complex colleges and universities and the specialized accrediting agencies which are concerned, in the main, only with component parts of the institution.

4. Accrediting agencies should increasingly involve related professions in the membership of both their policy- and decision-making bodies and visiting teams.

Related professionals bring a form of expertise and judgment which can be of great assistance to accrediting agencies. Not only would related professionals enhance the credibility of accrediting agencies, they also would do much to broaden their educational and social perspectives.

Recommendations for Further Research

The dialogue relative to the appropriate functions of accreditation and the principles which should guide it organization must be a continuing process. Moreover, the body of thought gathered in this study needs to be added to, further refined, and elucidated. Furthermore, its validity needs to be tested by comparing it with a body of thought collected from another population believed to be knowledgeable about accreditation and its social roles.

In addition, the data collected with regard to the organization of accrediting agencies, their policies, and procedures is likely to change rapidly. These data will need to be updated within only a few months.

A thorough study, categorizing and documenting the many and varied uses made of the status granted by accrediting agencies, would be of great benefit to nongovernmental accreditation.

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